

ADA Self-Evaluation And Program Access Plan

Adopted July 20, 2022

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Table of Contents

	1
BOARD APPROVAL	2
ADA NOTICE TO THE PUBLIC	3
FEDERAL REQUIREMENTS	4
STATE REQUIREMENTS	5
ADA Coordinator	5
REQUEST FOR ACCOMMODATION	5
COMPLAINT PROCEDURE	5
SELF-EVALUATION AND PROGRAM ACCESS PLAN	7
PUBLIC OUTREACH	7
Undue Burden	8
FACILITIES, PROGRAMS, SERVICES AND ACTIVITIES	8
CONCLUSION1	0
APPENDIX 1: SECTION 504 / ADA TITLE II COMPLIANCE ASSESSMENT (2020) 1	1
APPENDIX 2: ADA COMPLAINT FORM 1	8
APPENDIX 3: SELF-EVALUATION CHECKLISTS	23

Introduction

As a federally designated Metropolitan Planning Organization (MPO) and state designated Regional Transportation Planning Organization (RTPO), the Skagit Council of Governments (SCOG) is subject to the requirements of Title II of the Americans with Disabilities Act. Additionally, SCOG is the recipient of federal funds, making the organization subject to the requirements of Section 504 of the Rehabilitation Act of 1973 (Section 504). An updated Self-Evaluation & Access Plan implementation has been identified in the Unified Planning Work Program for State Fiscal Year 2022. This Self-Evaluation & Access Plan reviews nondiscrimination requirements under Section 504 and Title II and proposes strategies and specific actions to both bring SCOG into full compliance with all applicable rules and regulations and to provide a planning framework to ensure future compliance.

As part of its Metropolitan/Regional Transportation Planning Organization Agreement with WSDOT, SCOG agrees to comply with numerous Section 504 and ADA regulations. These regulations span Federal agencies including the Federal Highway Administration (FHWA), Federal Transit Administration (FTA), Department of Justice (DOJ), Equal Employment Opportunity Commission (EEOC), and Federal Communications Commission (FCC). During State Fiscal Year 2020 SCOG conducted a Section 504/ ADA Title II Compliance Assessment which is incorporated into the body of this Plan as Appendix 1.

The Skagit Council of Governments is committed to providing equal access to all public programs, services and activities for citizens with disabilities. This Program Access Plan will be used to guide future accessibility planning and implementation efforts and will be periodically updated to ensure that all SCOG programs, services and activities remain accessible and compliant with all applicable regulations.

Board Approval

The Skagit Council of Governments Transportation Policy Board approved this ADA Self-Evaluation and Program Access Plan at our regular meeting on July 20, 2022.

Commissioner Peter Browning, Skagit County Transportation Policy Board Chair	Date
Attest:	
Kevin Murphy Executive Director	Date

ADA Notice to the Public

The Skagit Council of Governments (SCOG) is committed to providing equal access to its facilities, programs and services for all persons with disabilities.

SCOG will ensure that no qualified disabled individual shall, solely on the basis of their disability, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any of its programs, services, or activities as provided by Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990 (ADA). SCOG further ensures that every effort will be made to provide nondiscrimination in all of its programs and activities regardless of the funding source.

A grievance procedure is available to resolve complaints. Grievance procedures can be requested by contacting the ADA Coordinator.

Individuals requiring reasonable accommodations may request written materials in alternate formats, sign language interpreters, physical accessibility accommodations, or other reasonable accommodations by contacting the ADA Coordinator, Kevin Murphy at 360-416-7871 or <u>kevinm@scog.net</u> at least two weeks before the activity or event.

Abbreviated ADA Notice to the Public

The Skagit Council of Governments fully complies with Section 504 of the Rehabilitation act of 1973 and the Americans with Disabilities Act of 1990 (ADA) and does not discriminate on the basis of disability. For more information, or to file a grievance contact the ADA Coordinator, Kevin Murphy at 360-416-7871 or kevinm@scog.net.

Locations ADA Notice to the Public Posted

The following is a list of locations where the AD Notice to the Public or Abbreviated ADA Notice to the Public is posted in English and Spanish:

- All SCOG public meeting agendas;
- SCOG's website; and
- SCOG offices located at 315 South Third Street Suite 100, Mount Vernon, WA 98273

Federal Requirements

The Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act of 1973 require organizations with less than fifty employees that are recipients or subrecipients of federal funds to conduct a self-evaluation and prepare an ADA Program Access Plan. The ADA went into effect in 1992 and is a civil rights law that prohibits discrimination against individuals with disabilities with regards to access to employment, public accommodations, government services and programs, public transportation and telecommunications.

Title I of the Americans with Disabilities Act

Title I of the ADA prohibits local governments from discriminating against individuals with disabilities in job application procedures, hiring, firing, advancement, compensation, job training and other terms, conditions and privileges of employment. Although SCOG does not meet the minimum threshold of fifteen employees specified in Title I, SCOG has adopted the following Disability Accommodation policy as Section 1.05 of the Personnel Handbook:

SCOG does not discriminate on the basis of physical or mental disability, or any other legally protected category. SCOG is also committed to providing reasonable accommodation to qualified individuals with disabilities if doing so does not cause an undue burden to the Agency. Any employee who is unable to perform one or more functions of his or her position due to a disability or medical condition is encouraged to request and discuss appropriate reasonable accommodations with SCOG. Should you need further information or have any questions concerning this policy, please speak to your supervisor.

Title II of the Americans with Disabilities Act

Title II of the ADA extends the general prohibitions against discrimination contained within Section 504 of the Rehabilitation Act of 1973 to all activities of State and local governments regardless of whether these entities receive Federal funds. It prohibits SCOG from denying individuals with disabilities equal opportunity to participate in its services, programs or activities. Title II requirements that apply to SCOG are:

- Clearly designate an ADA Coordinator who is responsible for overall Title II compliance. This designation shall be shared via printed materials, in SCOG facilities and on the SCOG website.
- Post an ADA Notice of Nondiscrimination. This notice shall be shared in printed materials, in SCOG facilities and on the SCOG website.
- Adopt an ADA Grievance Procedure. This procedure shall be shared in printed materials, in SCOG facilities and on the SCOG website.
- Conduct an updated ADA Self-Evaluation. 49 CFR §27.11 requires organizations to establish a system for periodically reviewing and updating self-evaluations. SCOG last conducted a self-evaluation in 2003. This updated Self-Evaluation will serve as the new

baseline evaluation and shall be reviewed and updated at four-year intervals moving forward.

• Develop a Program Access Plan. This plan will incorporate the self-evaluation and create a planning framework for correcting current deficiencies identified in the self-evaluation and ensuring future compliance.

State Requirements

The Washington State Department of Transportation (WSDOT) provides Section 504 and ADA compliance guidance to local agencies through Chapter 29 of the Local Agency Guidelines (LAG) Manual. The LAG Manual was last updated in June 2021 and clearly explains which requirements apply to agencies by staff size as well as providing references to the applicable regulations.

ADA Coordinator

The Skagit Council of Governments (SCOG) has designated the Executive Director as the ADA Coordinator. This position is responsible for ensuring that all programs, services and activities are accessible to individuals with disabilities. The SCOG ADA Coordinator is:

Kevin Murphy 315 South 3rd Street, Suite 100 Mount Vernon, WA 98273 (360) 416-7871 kevinm@scog.net

Request for Accommodation

Requests for accommodation or documents/materials in alternate formats should be made as soon as the need for accommodation is known, and at a minimum two weeks in advance. Requests should be made to the ADA Coordinator and should include the following:

- The requestor's name, address, email and phone number.
- A description of the accommodation or document/material format required.
- A brief description of why the accommodation is needed.

Complaint Procedure

This Complaint Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 (ADA). It may be used by anyone who wishes to file a complaint alleging

discrimination on the basis of disability in the provision of services, activities, programs or benefits by the Skagit Council of Governments (SCOG). SCOG's Personnel Handbook governs employment-related complaints of disability discrimination.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint will be made available for persons with disabilities upon request. Complaint forms are available at SCOG officers and on SCOG's website. The complaint form includes the complaint procedures specified below.

The complaint should be submitted by the complainant and/or their designee as soon as possible but no later than 60 calendar days after the alleged violation to the ADA Coordinator.

Within 15 calendar days after receipt of the complaint, the ADA Coordinator or their designee will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting the ADA Coordinator or their designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio message. The response will explain the position of the Skagit Council of Governments and offer options for substantive resolution of the complaint.

If the response by the ADA Coordinator or their designee does not satisfactorily resolve the issue, the complainant and/or their designee may appeal the decision within 15 calendar days after receipt of the response to the Skagit Council of Governments Board of Directors. At their next regularly scheduled meeting, the Board of Directors will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the Board of Directors or their designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

The procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies, or to seek private counsel for complaints alleging discrimination. An ADA complaint may be filed with any of the following offices:

- Skagit Council of Governments Attn: ADA Coordinator
 315 South Third Street, Suite 100 Mount Vernon, Washington 98273 Email: <u>kmurphy@scog.net</u> Phone: (360) 416-7871
- Washington State Department of Transportation Office of Equal Opportunity, ADA Program

SCOG ADA Self-Evaluation and Program Access Plan, July 20, 2022

310 Maple Park Avenue SE P.O. Box 47300 Olympia, WA 98504-7300 Email: <u>wsdotada@wsdot.wa.gov</u>

- Federal Highway Administration Office of Civil Rights 8th Floor E81-105 1200 New Jersey Avenue, SE Washington, DC 20590 Email: <u>CivilRights.FHWA@dot.gov</u>
- Federal Transit Administration
 Office of Civil Rights
 Attn: Complaint Team
 East Building, 5th Floor TCR
 1200 New Jersey Avenue, SE
 Washington, DC 20590
 Email: FTACivilRightsCommunications@dot.gov
- United States Department of Justice Civil Rights Division
 950 Pennsylvania Avenue, NW Washington DC, 20530-0001 Phone: (855) 856-1247

All written complaints received by the ADA Coordinator or their designee, appeals to the Board of Directors or their designee, and responses from these two offices will be retained by the Skagit Council of Governments for at least four years.

Self-Evaluation and Program Access Plan

The Self-Evaluation and Program Access Plan is a thorough assessment by SCOG staff of the accessibility of its facilities, programs, services and activities. It included a site assessment survey of SCOG administrative facilities and a written assessment of all SCOG programs and services.

Public Outreach

As part of the self-evaluation process SCOG staff presented the draft Self-Evaluation and Program Access Plan to the 2022 Skagit Special Needs Transportation Committee for review and recommendation to the SCOG Transportation Policy Board. The Special Needs Transportation Committee is an ad hoc committee comprised of a diverse group of stakeholders that represent

special needs communities within the Skagit region. There was also a written public comment period from June 29, 2022 to July 12, 2022 prior to adoption of the Self-Evaluation and Program Access Plan by the Transportation Policy Board on July 20, 2022. The Self-Evaluation and Program Access Plan will also be posted to the SCOG website.

SCOG will update the Self-Evaluation and Program Access Plan every four years to coincide with the organization of the Special Needs Transportation Committee. These periodic updates will ensure that the plan remains current with regards to regulations, public input and SCOG facilities, programs, services and activities.

Undue Burden

According to the ADA, SCOG is not required to provide an accommodation or modification if it would create a significant alteration of services or create an undue financial or administrative burden. This determination can be made by the ADA Coordinator or their designee and must be accompanied by a written statement citing the reasons for reaching that conclusion. If an action would result in such an alteration or such burdens, SCOG shall take any other action that would not result in such an alteration or such burdens but would still ensure that individuals with disabilities receive access to SCOG facilities, programs, services and activities.

Facilities, Programs, Services and Activities

The following are a summary of findings of the Self-Evaluation. The complete Self-Evaluation checklists are attached to this plan as Appendix 1.

Facilities

SCOG currently occupies a ground floor office space as a tenant. The physical location of the SCOG office is:

315 South 3rd Street, Suite 100 Mount Vernon, WA 98273

A site survey of the SCOG office was conducted on April 21, 2022. The checklist used was produced by the Institute for Human Centered Design in conjunction with the ADA National Network and is based on the 2010 ADA Standards for Accessible Design. Items found to be deficient during the site survey are:

• The parking lot has an ADA accessible parking space that is identified by markings on the ground, but a sign that includes the International Symbol of Accessibility is not present. The parking space also meets the requirements for van accessibility but is lacking signage.

- <u>Recommendation</u>: Staff will work with the property owner to install a sign indicating the presence of a van accessible parking space.
- Some light switches in common areas are obscured by furniture or other objects resting on the floor.
 - <u>Recommendation</u>: Staff will work to ensure that light switches in common areas are accessible.
- Signs to the toilet rooms are mounted directly on doors without closers.
 - <u>Recommendation</u>: Staff will work with the property owner to install door closers or mount signs to the wall next to doors.
- The toilet paper dispensers are mounted closer to the front of the water closet than the 2010 ADA standards for Accessible Design specify.
 - <u>Recommendation</u>: Staff will work with the property owner to relocate the toilet paper dispensers.
- The toilet grab bars are mounted closer to the side and back wall of the water closet than the 2010 ADA standards for Accessible Design specify.
 - <u>Recommendation</u>: Staff will work with the property owner to relocate the toilet grab bars.

Programs, Services and Activities

SCOG staff conducted a written assessment of all programs, services and activities. This evaluation was conducted in March and April of 2022 using checklists developed by the New England ADA Center. Items found to be deficient during the written assessment are:

- There is no published written notice of nondiscrimination on the basis of disability.
 - <u>Recommendation</u>: Staff should develop a written notice that is incorporated into the Self-Evaluation and Program Access Plan and which will also be posted to the SCOG website and within SCOG office facilities. This document will fulfill that requirement.
- There is no written grievance procedure.
 - <u>Recommendation</u>: Staff should develop a grievance procedure which is incorporated into the Self-Evaluation and Program Access Plan and which will be posted to the SCOG website and within SCOG office facilities. This document will fulfill that requirement.
- SCOG has not designated an ADA Coordinator.

- <u>Recommendation</u>: The SCOG Executive Director should designate an ADA Coordinator and incorporate written notice into the Self-Evaluation and Program Access Plan and post that notice to the SCOG website and within SCOG office facilities. This document will fulfill that requirement.
- SCOG has not developed a Program Access Plan.
 - <u>Recommendation</u>: SCOG should conduct an updated self-evaluation and incorporate that into a Program Access Plan. This document will fulfill that requirement.
- There is currently not a website accessibility policy in place, nor is staff trained on website accessibility.
 - <u>Recommendation</u>: The current SCOG website does have an accessibility options widget that allows individuals with disabilities to customize the website to meet their needs. The ADA coordinator will prioritize staff training on website accessibility and staff will test the website for compliance, making changes if necessary.
- There is currently no policy in place for providing accommodation upon request. There are also no identified local resources for auxiliary aids and services, documents in alternative formats or telecommunications services.
 - <u>Recommendation</u>: Staff should incorporate a written policy on requests for accommodation into the Self-Evaluation and Program Access Plan. Staff should identify local resources for a variety of accommodations and keep the list readily available so that they are prepared to promptly handle requests for accommodation when they arise.
- Staff are currently untrained with regards to rules and regulations regarding service animals.
 <u>Recommendation</u>: The ADA Coordinator should ensure that staff are trained on rules and regulations governing service animals.

Conclusion

The Self-Evaluation and Program Access Plan will continue to be reviewed and updated as needed to account for changes in applicable rules and regulations and to changes in the built environment. Based upon staff review and direction from the Transportation Policy Board, minor updates may be made to the Plan on an as-needed basis, with a process for more substantive review and revisions taking place every four years.

Appendix 1: Section 504 / ADA Title II Compliance Assessment (2020)

SCOG ADA Self-Evaluation and Program Access Plan, July 20, 2022

Introduction

As a federally designated Metropolitan Planning Organization (MPO) and state designated Regional Transportation Planning Organization (RTPO), Skagit Council of Governments (SCOG) is subject to the requirements of Title II of the Americans with Disabilities Act. Additionally, SCOG is the recipient of federal funds, making the organization subject to the requirements of Section 504 of the Rehabilitation Act of 1973 (Section 504). A review of SCOG's activities and compliance with Section 504 and Title II requirements has been identified in the Unified Planning Work Program for State Fiscal Year 2020. This assessment reviews nondiscrimination requirements under Section 504 and Title II, and recommends future work items to ensure current and future nondiscrimination in SCOG programs and activities.

Background

As part of its Metropolitan/Regional Transportation Planning Organization Agreement with WSDOT, SCOG agrees to comply with numerous Section 504 and ADA regulations. These regulations span Federal agencies including the Federal Highway Administration (FHWA), Federal Transit Administration (FTA), Department of Justice (DOJ), Equal Employment Opportunity Commission (EEOC), and Federal Communications Commission (FCC). Some of the regulations cited in the agreement seemed not to apply to SCOG, as they focused on activities such as the construction of new facilities or provision of transit services. The following regulations and sources were reviewed as a part of this assessment:

Agency	Regulation	Statute
US DOJ	28 CFR pt. 35	Title II ADA
USDOT/FHWA	49 CFR pt. 27	Section 504
USDOT/FHWA	49 CFR §27.19	ADA
FTA	49 CFR pt. 37	Section 504/ADA
EEOC	29 CFR pt. 1630	Title I ADA
FCC	47 CFR pt. 64, Subpart F	ADA

Reviewed Regulations Governing Section 504/Title II ADA Compliance

Other Sources

- <u>WSDOT Local Area Guidelines (LAG) Manual Chapter 29: Section 504 and the Americans</u> with Disabilities Act, Retrieved March 9, 2020
- WSDOT 2018 ADA Transition Plan, Retrieved March 9, 2020
- WSDOT ADA Annual Report 2019, Retrieved March 9, 2020

Assessment of Section 504 and ADA Regulations

Recipient Requirements

Section 504 Regulations: FHWA

The regulations governing Section 504 compliance, 49 CFR part 27, apply to *all* recipients of Federal financial assistance from the Department of Transportation, and to their programs and activities. In general, the regulations prohibit discrimination on the basis of disability. The recipients of Federal funds should provide aids, benefits, and services that are equally effective among those with disabilities and those without. In other words, the benefits should give those with disabilities an equal opportunity for access. The accommodations should be reasonable, not resulting in an undue financial and administrative burden. Specifically, the regulations call out the following areas:

- Communications: Recipients should ensure that communications are available to persons with impaired vision and hearing.
- Include written assurances in applications for Federal financial assistance.
- Designate a responsible employee & adopt complaint procedures.
- Develop nondiscrimination notice and include nondiscrimination statement in publications.

Extending Section 504 and ADA Title II

49 CFR §27.19 extends the requirements of ADA to recipients subject to the Section 504 regulations of 49 CFR part 27. In particular, this section calls out the fact that recipients shall comply with FTA regulations under 49 CFR parts 37 and 38, DOJ regulations under 28 CFR part 35, and EEOC regulations implementing title I of ADA (29 CFR part 1630). Compliance with EEOC title I regulations is required for all recipients, even those who would not be subject to EEOC regulations due to a small staff size (fewer than 25 or 15 employees).

Section 504 and ADA Title II Regulations: FTA

The nondiscrimination regulations under 49 CFR pt. 37 govern both Title II and Title III of ADA. In terms of Title II, the regulations state that "no entity shall discriminate against an individual with a disability in connection with the provision of transportation service." (49 CFR 37.5(a)). Many of the regulations are specific to the provision of accessible vehicles and

transportation facilities. However, the following areas were found to be relevant to SCOG's programs and activities:

• Designate a responsible employee & adopt complaint procedures

ADA Regulations: DOJ The requirements under 28 CFR 35 implement subtitle A of title II of ADA, applying to all public entities apart from those under subtitle B, namely public transportation providers. The following areas are called out in the DOJ regulations for all public entities, regardless of size:

- Conduct a self-evaluation of services, policies, and practices and provide opportunity for public input.
- Provide notice of nondiscrimination.
- Ensure effective communications for those with disabilities.
- Provide information and signage to communicate existence and location of accessible services.
- Ensure nondiscrimination in employment (relates to title I of ADA).
- Permit use of mobility devices, personal devices or services, and service animals.
- Maintain accessible features.

Some regulations in this section under 28 CFR pt. 35 only apply to organizations of 50 or more employees, including:

- Designate a responsible employee & adopt complaint procedures
- Make available a record of the self-evaluation including persons consulted, problems identified, and modifications made.

The DOJ regulations regarding adoption of complaint procedures and the identification of a designated employee are more limited than those of 49 CFR pt. 27 and 37, which require these actions for agencies of any size.

Other Regulations: EEOC and FCC

While 49 CFR part 27.19 clarifies that SCOG must comply with the EEOC regulations governing title I of ADA, these regulations are not included in this assessment, as the assessment focuses on Section 504 and ADA Title II compliance. The FCC regulation 47 CFR part 64, Subpart F, was reviewed since it is specifically included in the Metropolitan/Regional Transportation Planning Organization Agreement with WSDOT; however, there did not seem to be any applicability to SCOG, as SCOG is not a common carrier providing voice transmission services. Other regulations referenced in the same agreement were not reviewed, such as those describing accessibility specifications for transit vehicles, or standards related to the construction of public buildings.

Relationship to Washington State Department of Transportation

Through the LAG Manual, WSDOT provides guidance for local agencies to comply with Section 504 and ADA requirements. Chapter 29 of the LAG Manual, entitled *Section 504 and the Americans with Disabilities Act*, was recently updated in May 2019 and clearly explains requirements for local agencies, as well as includes an appendix of requirements by agency staff size, and corresponding regulations. The LAG manual makes clear that FHWA requires WSDOT to enforce sub-recipients' compliance with Section 504 and ADA. Providing guidance for local agencies is a focus in the most recent WSDOT ADA Transition Plan, adopted in 2018:

Local Programs continues to encourage Washington's local public agencies toward compliance with their ADA responsibilities. Past activities have included ADA training, providing technical assistance and monitoring compliance with ADA requirements on existing federal aid projects. Local Programs anticipates implementing a deadline for certified acceptance agencies to have ADA transition plans in place, beginning three years after the approval of WSDOT's transition plan, in order for those agencies to continue to be eligible for federal highway funding. All other agencies should be in compliance no later than five years following the approval of WSDOT's transition plan in order to continue to remain eligible to receive federal highway funds (WSDOT 2018 ADA Transition Plan).

In its most recent ADA Annual Report, WSDOT identified that the Office of Equal Opportunity and Local Programs would be working to develop "...guidance for Cities, Counties, and other Local Public Agencies in developing their own ADA Transition Plans" in the 2020 Federal Fiscal Year (WSDOT ADA Annual Report 2019). It is expected that more resources could become available from WSDOT to ensure ADA and Section 504 compliance in the near future.

Recommendations

Action	Description	Corresponding Regulation
Clearly Designate a Section 504/ADA Coordinator	In the 2003 Self-Evaluation Review Form, the SCOG Executive Director is identified as the ADA Coordinator. However, this is not currently reflected in printed materials or on the SCOG website.	Section 504: <u>49 CFR §</u> <u>27.13</u> – applies to federal recipients ADA Title II: <u>28 CFR</u> <u>§35.107</u> – applies to public entities with 50 or more employees

The following section outlines recommended actions for SCOG to undertake to ensure continued compliance with Section 504 and Title II requirements:

Post Section 504/ADA Notice	Develop and post a Section 504/ADA notice of non-discrimination in SCOG programs and activities. This notification should be shared in printed materials, as well as in the SCOG office.	Section 504: <u>49 CFR</u> <u>§27.15</u> – applies to federal recipients ADA Title II: <u>28 CFR</u> <u>§35.106</u> – applies to all public entities	
Adopt a Section 504/ADA Grievance Procedure	Develop and adopt a grievance/complaint procedure under Section 504 (Title II of ADA does not apply in this case). The procedure should be advertised to the public such as on the website, and should be accessible and usable by those with disabilities.	Section 504: <u>49 CFR §</u> <u>27.13</u> – applies to federal recipients ADA Title II: <u>28 CFR</u> <u>§35.107</u> – applies to public entities with 50 or more employees	
Conduct Updated Self-Evaluation	Self-Evaluation of local agencies is required to include the opportunity for the disabled community and service organizations to provide input, under Section 504, as well as Title II of ADA for <i>all</i> public agencies. It is uncertain whether or not this has been done in previous self-evaluations. A self-evaluation review conducted by SCOG was submitted to Washington State Office of Community Development in 2003. An updated evaluation would be helpful to assess current barriers and opportunities to access. Section 504 calls for establishing "a system for periodically reviewing and updating the evaluation" (49 CFR §27.11).	Section 504: <u>49 CFR</u> <u>§27.11</u> – applies to federal recipients. Recipients should maintain the evaluation on file and make it available to the public for 3 years. ADA Title II: <u>28 CFR</u> <u>§35.105</u> – applies to all public entities. Entities with 50 or more employees are required to maintain the self- evaluation on file and make it available to the public for three years.	
Develop Compliance Planning Framework	Section 504 requires federal recipients to "Take appropriate remedial steps to eliminate the effects of any discrimination that resulted from previous policies and practices" (49 CFR §27.11). Under Title II of ADA, all public entities are responsible for making "the necessary modifications" to meet ADA requirements, regardless of agency size. SCOG should develop a framework for removing barriers to access identified through the self-evaluation. In Title II, only	Section 504: <u>49 CFR</u> <u>§27.11</u> – applies to federal recipients. ADA Title II: <u>28 CFR</u> <u>§35.105</u> – applies to all public entities. Entities with 50 or more employees are required to maintain self- evaluation/remedial actions on file and make	

entities with 50 or more employees are required to keep/make available this information for 3 years (ADA Transition Plan). However, this is required for all	
federal recipients under Section 504.	

Appendix 2: ADA Complaint Form

SCOG ADA Self-Evaluation and Program Access Plan, July 20, 2022



Federally Funded Transportation Program

Americans with Disabilities Act Complaint Form

ADA COMPLAINT FORM

To submit an ADA complaint to the Skagit Council of Governments, fill out this form and mail it to:

• Skagit Council of Governments Attn: ADA Coordinator 315 South Third Street, Suite 100 Mount Vernon, WA 98273

Alternatively, this form can be emailed to <u>kmurphy@scog.net</u>. This form can also be filed with the agencies that appear on the last page.

If you have questions about this complaint form or compliant procedures, need ADA translation services, or other assistance related to an ADA complaint contact Kevin Murphy at (360) 416-7871 or <u>kmurphy@scog.net</u>.

COMPLAINT INFORMATION

- 1. Complainant Name (please print):
- 2. Phone number:
- 3. Email:
- 4. Best time of day to contact you about this compliant:
- 5. Home address (*address number, street, city, state, zip code*):
- 6. Discrimination alleged because of:
- 7. Date of alleged incident:
- 8. Who discriminated against you?

Name:

Name of Organization:

Address:

Phone number:

SCOG ADA Self-Evaluation and Program Access Plan, July 20, 2022

Email:

- 9. Explain what happened, why you believe it happened, and how you were discriminated against. Indicate who was involved. Be sure to include how other persons were treated differently than you. If you have any other information about what happened, please attach supporting documentation to the form. (Attach additional pages if more space is needed.)
- 10. What remedy are you seeking for the alleged discrimination? Please note that this process will not result in the payment of punitive damages or financial compensation.
- 11. List any other persons that we should contact for additional information in support of your complaint. Please list their names, phone numbers, addresses and email addresses below.
- 12. Have you filed your complaint, grievance, or lawsuit with any other agency or court?

Which agency or court: Filing date:

Status (pending, resolved, etc.):

Result, if known:

Complaint number, if known:

Do you have an attorney in this matter?

Complainant Signature

Date

COMPLAINT PROCEDURES

This Complaint Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 (ADA). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs or benefits by the Skagit Council of Governments (SCOG). SCOG's Personnel Handbook governs employment-related complaints of disability discrimination.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint will be made available for persons with disabilities upon request. Complaint forms are available at SCOG officers and on SCOG's website. The complaint form includes the complaint procedures specified below.

The complaint should be submitted by the complainant and/or their designee as soon as possible but no later than 60 calendar days after the alleged violation to the ADA Coordinator.

Within 15 calendar days after receipt of the complaint, the ADA Coordinator or their designee will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting the ADA Coordinator or their designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio message. The response will explain the position of the Skagit Council of Governments and offer options for substantive resolution of the complaint.

If the response by the ADA Coordinator or their designee does not satisfactorily resolve the issue, the complainant and/or their designee may appeal the decision within 15 calendar days after receipt of the response to the Skagit Council of Governments Board of Directors. At their next regularly scheduled meeting, the Board of Directors will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the Board of Directors or their designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

The procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies, or to seek private counsel for complaints alleging discrimination. An ADA complaint may be filed with any of the following offices:

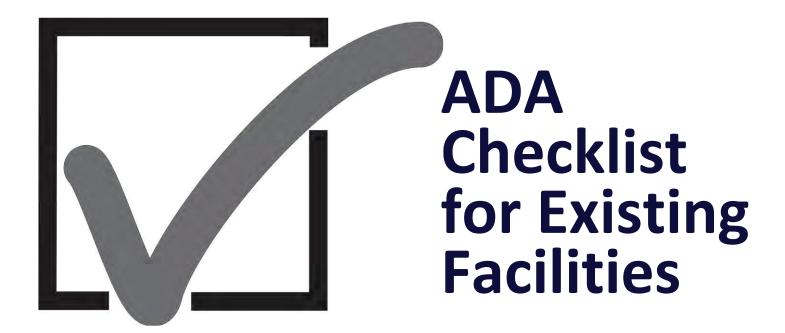
- Skagit Council of Governments Attn: ADA Coordinator
 315 South Third Street, Suite 100 Mount Vernon, Washington 98273 Email: <u>kmurphy@scog.net</u>
 Phone: (360) 416-7871
- Washington State Department of Transportation Office of Equal Opportunity, ADA Program 310 Maple Park Avenue SE P.O. Box 47300 Olympia, WA 98504-7300 Email: <u>wsdotada@wsdot.wa.gov</u>
- Federal Highway Administration Office of Civil Rights 8th Floor E81-105 1200 New Jersey Avenue, SE Washington, DC 20590 Email: CivilRights.FHWA@dot.gov
- Federal Transit Administration
 Office of Civil Rights
 Attn: Complaint Team
 East Building, 5th Floor TCR
 1200 New Jersey Avenue, SE
 Washington, DC 20590
 Email: <u>FTACivilRightsCommunications@dot.gov</u>
- United States Department of Justice Civil Rights Division
 950 Pennsylvania Avenue, NW Washington DC, 20530-0001 Phone: (855) 856-1247

All written complaints received by the ADA Coordinator or their designee, appeals to the Board of Directors or their designee, and responses from these two offices will be retained by the Skagit Council of Governments for at least four years.

SCOG ADA Self-Evaluation and Program Access Plan, July 20, 2022

Appendix 3: Self-Evaluation Checklists

SCOG ADA Self-Evaluation and Program Access Plan, July 20, 2022



Based on the 2010 ADA Standards for Accessible Design



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ADA National Network www.ADAta.org

Questions on the ADA 800-949-4232 voice/tty Questions on checklist 617-695-0085 voice/tty ADAinfo@NewEnglandADA.org This checklist was produced by the New England ADA Center, a project of the Institute for Human Centered Design and a member of the ADA National Network. This checklist was developed under a grant from the Department of Education, NIDRR grant number H133A060092-09A. However the contents do not necessarily represent the policy of the Department of Education, and you should not assume endorsement by the Federal Government.

Questions or comments on the checklist contact the New England ADA Center at 617-695-0085 voice/tty or ADAinfo@NewEnglandADA.org

For the full set of checklists, including the checklists for recreation facilities visit www.ADAchecklist.org.

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ADA Checklist for Existing Facilities

The Americans with Disabilities Act (ADA) requires state and local governments, businesses and non-profit organizations to provide goods, services and programs to people with disabilities on an equal basis with the rest of the public.

Some people think that only new construction and alterations need to be accessible and that older facilities are "grandfathered," but that's not true. Because the ADA is a civil rights law and not a building code, older facilities are often required to be accessible to ensure that people with disabilities have an equal opportunity to participate.

The ADA has different requirements for state and local governments and for places of public accommodation (businesses and non-profit organizations that serve the public).

Requirements for State and Local Governments

State and local governments must ensure that services, programs and activities, when viewed in their entirety, are accessible to people with disabilities. This is part of public entities' program accessibility obligations. Alterations to older buildings may be needed to ensure program accessibility. Generally this is a greater obligation than "readily achievable barrier removal" the standard that applies to public accommodations. State and local governments are not required to take any action that would result in undue financial and administrative burdens.

State and local governments' ADA obligations for program accessibility are in the Department of Justice's ADA Title II regulations 28 CFR Part 35.150.

How to Use this Checklist

Get Organized

One person can conduct a survey, but it's easier with two people. One person can take measurements and the other person can fill out the checklist and take photos.

Obtain Floor Plan or Make Sketch

A floor plan helps the surveyors to get organized and to know how many elements there are, such as entrances and toilet rooms. If plans are not available, sketch the exterior and interior layout of interior and exterior spaces and mark the elements on the sketch.

Make Copies of the Checklist

Determine how many copies of each section of the checklist you need. For example, most facilities have more than one toilet room.

Gather Tools

- Checklist
- Clipboard
- Tape measure
- Electronic or carpenter's level 24 inches
- Door pressure gauge or fish scale
- Camera
- Bag to hold these items

Requirements for Places of Public Accommodation

Businesses and non-profit organizations that serve the public must remove architectural barriers when it is "readily achievable" to do so; in other words, when barrier removal is "easily accomplishable and able to be carried out without much difficulty or expense."

The decision of what is readily achievable is made considering the size, type, and overall finances of the public accommodation and the nature and cost of the access improvements needed. Barrier removal that is difficult now may be readily achievable in the future as finances change.

Public accommodations' ADA obligations for barrier removal are in the Department of Justice's ADA Title III regulations 28 CFR Part 36.304.

Priorities for Accessibility

The checklist follows the four priorities that are listed in the Department of Justice ADA Title III regulations. These priorities are equally applicable to state and local government facilities.

- Priority 1 Accessible approach and entrance
- Priority 2 Access to goods and services
- Priority 3 Access to public toilet rooms
- Priority 4 Access to other items such as water fountains and public telephones

Conduct the Survey

Start Outside

Start from site arrival points such as drop-off areas and sidewalks. Determine if there is an accessible route to an accessible entrance. If there is a parking lot or garage check for the correct number of accessible parking spaces, including van-accessible spaces. Is there an accessible route from the accessible parking spaces to an accessible entrance? Next survey the entrances. If there is an accessible entrance, determine if there are signs at inaccessible entrances directing people to the accessible entrance. Go inside and continue through the facility.

Keep Good Notes

Write on the front of each checklist where you are surveying. You may end up with six toilet room checklists. When you get back to your office you'll want to know which one is the checklist for the first floor women's room. If there isn't an accessible entrance you'll want to indicate how many steps there are and how much space is available to install a ramp or lift. This is a good time to take photographs.

Take Good Measurements

When in doubt write it down. It's better to have too much information than not enough. Even if something is in compliance it's helpful to have exact measurements.

2010 ADA Standards for Accessible Design

The checklist is based on the 2010 ADA Standards for Accessible Design (2010 Standards). The checklist does not include all sections of the 2010 Standards. For example there are no questions about patient rooms in hospitals or guest rooms in hotels. Consult the 2010 Standards for situations not covered in the checklist. Full compliance with the 2010 Standards is required only for new construction and alterations.

Safe Harbor – Construction Prior to March 15, 2012

Elements in facilities built or altered before March 15, 2012 that comply with the 1991 ADA Standards for Accessible Design (1991 Standards) are not required to be modified to specifications in the 2010 Standards. For example, the 1991 Standards allow 54 inches maximum for a side reach range to a control such as the operating part of a paper towel dispenser. The 2010 Standards lower that side reach range to 48 inches maximum. If a paper towel dispenser was installed prior to March 15, 2012 with the highest operating part at 54 inches, the paper towel dispenser does not need to be lowered to 48 inches.

Elements in the 2010 Standards that aren't in the 1991 Standards

The 2010 Standards contain elements that are not in the 1991 Standards. These elements include recreation facilities such as swimming pools, team and player seating, accessible routes to court sports facilities, saunas and steam rooms, fishing piers, play areas, exercise machines, golf facilities, miniature golf facilities, amusement rides, shooting facilities with firing positions, and recreational boating facilities. Because these elements are not in the 1991 Standards, they are not subject to the safe harbor exemption. State and local governments must make these items

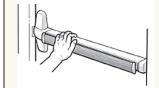


Parking Spaces

Measure from the center of marking lines. If lines are not adjacent to another space or aisle the measurement can be to the full width of the line.



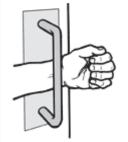
Door Clear Width Open the door 90 degrees, measure from the face of the door to the edge of the door stop.



Door Opening Force

Place the door pressure gauge where you would push open the door.

If you're using a fish scale, place it where you would pull open the door.



accessible if necessary to ensure program accessibility, unless an undue burden would result. Public accommodations must remove architectural barriers to these items.

What this Checklist is Not

The ADA Title II and III regulations require more than program accessibility and barrier removal. The regulations include requirements for nondiscriminatory policies and practices and for the provision of auxiliary aids and services, such as sign language interpreters for people who are deaf and material in Braille for people who are blind. This checklist does not cover those requirements.

Since this checklist does not include all of the 2010 Standards it is not intended to determine compliance for new construction or facilities being altered.

What are Public Accommodations?

Under the ADA public accommodations are private entities that own, lease, lease to or operate a place of public accommodation. This means that both a landlord who leases space in a building to a tenant and the tenant who operates a place of public accommodation have responsibilities to remove barriers.

A place of public accommodation is a facility whose operations affect commerce and fall within at least one of the following 12 categories:

- 1) Places of lodging (e.g., inns, hotels, motels, except for owner-occupied establishments renting fewer than six rooms)
- 2) Establishments serving food or drink (e.g., restaurants and bars)
- 3) Places of exhibition or entertainment (e.g., motion picture houses, theaters, concert



Accessible Slopes

You can measure slope with a 24 inch level and a tape measure. Put the level on the surface in the direction you are

measuring. Put one end at the high point of the surface and raise the other end so that the bubble is in the middle of the level's gauge. The level is now level. Measure the distance between the end of the level at its bottom point and the surface.

For a ramp the maximum running slope allowed is 1:12. That means for every inch of height change there should be at least 12 inches of ramp run. If the distance between the bottom of the level and the ramp surface is 2 inches or less, then the slope is 1:12 or less (2:24 = 1:12 and 1.5:24 = 1:16 which is a more gradual slope than 1:12). If the distance is greater than 2 inches, the ramp is too steep. For example, if the distance is 3 inches, then the slope is 1:8 (3:24 = 1:8 which is a steeper slope than 1:12).

For the parts of an accessible route that aren't a ramp, the maximum running slope allowed is 1:20. That means for every inch of height change there must be at least 20 inches of route run. The distance from the bottom edge of the level to the surface should be no more than 1.2 inches (1.2:24 = 1:20).

halls, stadiums)

- 4) Places of public gathering (e.g., auditoriums, convention centers, lecture halls)
- 5) Sales or rental establishments (e.g., bakeries, grocery stores, hardware stores, shopping centers)
- 6) Service establishments (e.g., laundromats, dry-cleaners, banks, barber shops, beauty shops, travel services, shoe repair services, funeral parlors, gas stations, offices of accountants or lawyers, pharmacies, insurance offices, professional offices of health care providers, hospitals)
- 7) Public transportation terminals, depots, or stations (not including facilities relating to air transportation)
- 8) Places of public display or collection (e.g., museums, libraries, galleries)
- 9) Places of recreation (e.g., parks, zoos, amusement parks)
- 10) Places of education (e.g., nursery schools, elementary, secondary, undergraduate, or postgraduate private schools)
- 11) Social service center establishments (e.g. , day care centers, senior citizen centers, homeless shelters, food banks, adoption agencies)
- 12) Places of exercise or recreation (e.g., gymnasiums, health spas, bowling alleys, golf courses).

For the cross slope of an accessible route the maximum slope allowed is 1:48. The distance from the bottom edge of the level to the surface should be no more than $\frac{1}{2}$ inch (.5:24 = 1:48). The cross slope of an accessible route is the slope that is perpendicular to the direction of pedestrian travel.

Slopes may also be measured using a digital level. Be sure to read the instructions. Measure with the percent calculation rather than the degrees calculation. For a ramp the maximum running slope allowed is 8.33% (8.33% is a 1:12 slope). For an accessible route without a ramp the maximum running slope allowed is 5% (1:20). For the cross slope of an accessible route the maximum slope allowed is 2.083% (1:48).

Check that You Got Everything - Before you leave the site review all the checklists. Make sure you know which checklist goes with which entrance and which toilet room and that you've got all the information you need. It is better to do it now than to have to go back.

After the Survey

List Barriers and Solutions - Consider the solutions listed beside each question on the checklist and add your own ideas. Consult with building contractors and equipment suppliers to estimate the costs for making modifications.

Resources

U.S. Department of Justice ADA Information 800-514-0301 voice 800-514-0383 TTY www.ada.gov

ADA National Network 800-949-4232 voice/TTY connects to your regional ADA Center www.adata.org

U.S. Access Board

800- 872-2253 voice 800-993-2822 TTY www.access-board.gov

ADA Title III Regulations 28 CFR Part 36 www.ada.gov/regs2010/titleIII_2010/titleIII_2010_regulations.htm

2010 ADA Standards for Accessible Design

www.ada.gov/2010ADAstandards_index.htm

1991 ADA Standards for Accessible Design www.ada.gov/stdspdf.htm

Tax Deductions and Credits for Barrier Removal www.ada.gov/taxincent.htm

Acknowledgements

Many of the illustrations are from the U.S. Department of Justice and the U.S. Access Board or are based on illustrations produced by the U.S. Access Board and the U.S. Department of Justice. **Develop a Plan** – State and local governments were required to develop a Transition Plan a few years after the ADA went into effect. Conducting a current survey is a good opportunity to update the plan.

Although places of public accommodation are not required to have a plan,, the Department of Justice recommends one: "...Such a plan...could serve as evidence of a good faith effort to comply..."

Prioritize items, make a timeline, decide who is responsible to carry out the plan and develop a budget.

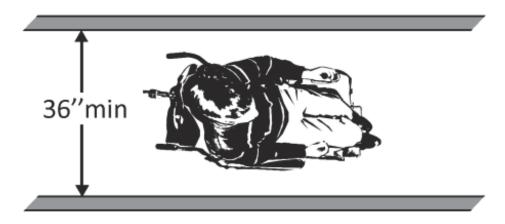
Make Changes - Use the 2010 ADA Standards for Accessible Design. Check whether local and state building codes require greater accessibility when alterations are undertaken.

Follow Up - Review the plan each year to evaluate whether more access improvements can be made.

ADA Checklist for Existing Facilities

Priority 1 – Approach & Entrance

Based on the 2010 ADA Standards for Accessible Design



Project SCOG 2022 Self-Evaluation

Building SCOG Staff Offices

Location 315 South 3rd St, Ste 100, Mount Vernon, WA 98273

Date 4/21/2022

Surveyors Grant Johnson, Associate Planner

Contact Information grantj@scog.net

An accessible route from site arrival points and an accessible entrance should be provided for everyone.



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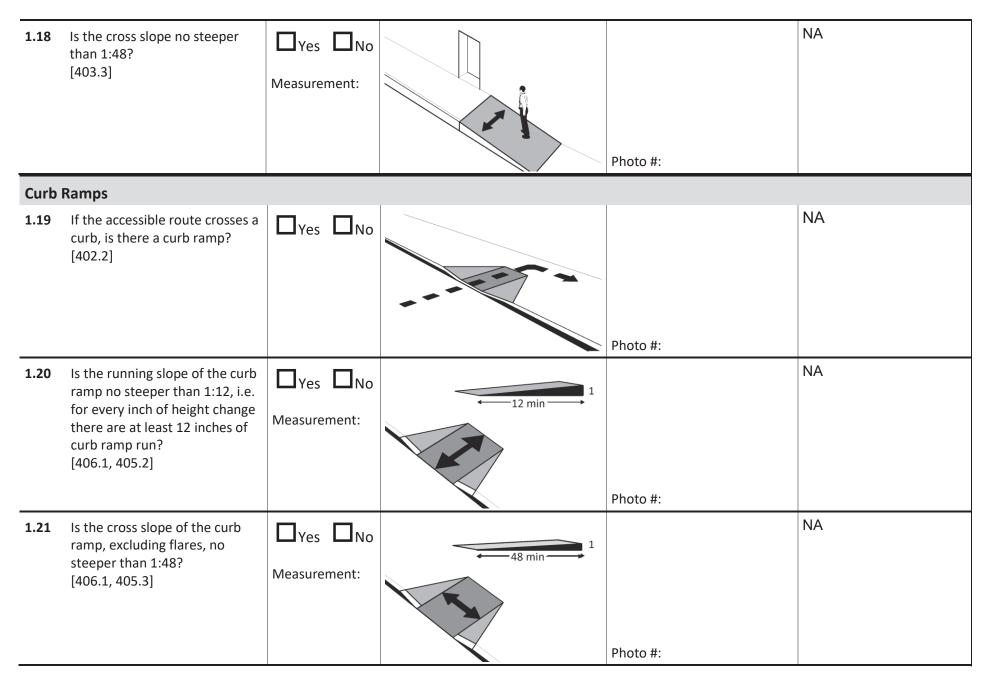
Prio	rity 1 – Approach & Entra	ince			Comments	Possible Solutions
1.1	Is there at least one route from site arrival points (parking, passenger loading zones, public sidewalks and public transportation stops) that does not require the use of stairs? [See 2010 ADA Standards for Accessible Design – 206.2.1]	Yes No If yes, location of route:	From designated to main entrance		Photo #:	
Park	ing Accessible parking spaces should b	e identified by size, a	access aisle and signa	ge.		
1.2	If parking is provided for the public, are an adequate number of accessible spaces provided?	Yes \square_{No}	Total Spaces	Accessible Spaces		
		Total #1 4 a	1 - 25	1		
	[208.2]	Total #: 12	26 - 50	2		
		Accessible #: 1	51 - 75	3		
			76 - 100	4		
			100+ see 2010 Standards 208.2		Photo #:	
1.3	Of the accessible spaces, is at least one a van accessible space?* [208.2.4]	₩Yes □No	*For every 6 or fraction of 6 parking spaces required by the table above, at least 1 should be a van accessible space.			* If constructed before 3/15/2012, parking is compliant if at least 1 in every 8 accessible spaces is van accessible
					Photo #:	

1.4	Are accessible spaces at least 8 feet wide with an access aisle at least 5 feet wide? [502.2, 502.3] Note: Two spaces may share an access aisle. Check state/local requirements; some specify that each space have its own aisle.	Yes No Measurement: 8' space 9' aisle	$ \begin{array}{c c} \hline \\ \hline \\$	Photo #:	
1.5	Is the van accessible space: At least 11 feet wide with an access aisle at least 5 feet wide? Or At least 8 feet wide with an access aisle at least 8 feet wide? [502.2]	Yes No Measurement: 8' Yes No Measurement: 9'	$ \begin{array}{c} \hline \\ \hline $	Photo #:	
1.6	Is at least 98 inches of vertical clearance provided for the van accessible space? [502.5]	Yes No Measurement: No cover	98"min	Photo #:	

1.7	Are the access aisles marked so as to discourage parking in them? [502.3.3] Note: The marking method and color may be addressed by state/local requirements.	✓Yes □No Painted stripes	area to be marked	Photo #:	
1.8	Is the slope of the accessible parking spaces and access aisles no steeper than 1:48 in all directions? [502.4]	Yes No Measurement: No detectable slope		Photo #:	
1.9	Do the access aisles adjoin an accessible route? [502.3]	Yes No Direct route to entrance		Photo #:	
1.10	Are accessible spaces identified with a sign that includes the International Symbol of Accessibility? Is the bottom of the sign at least 60 inches above the ground? [502.6] Note: The International Symbol of Accessibility is not required	☐Yes ☑No Yes ☑No Measurement:	60"min		No sign present
				Photo #:	

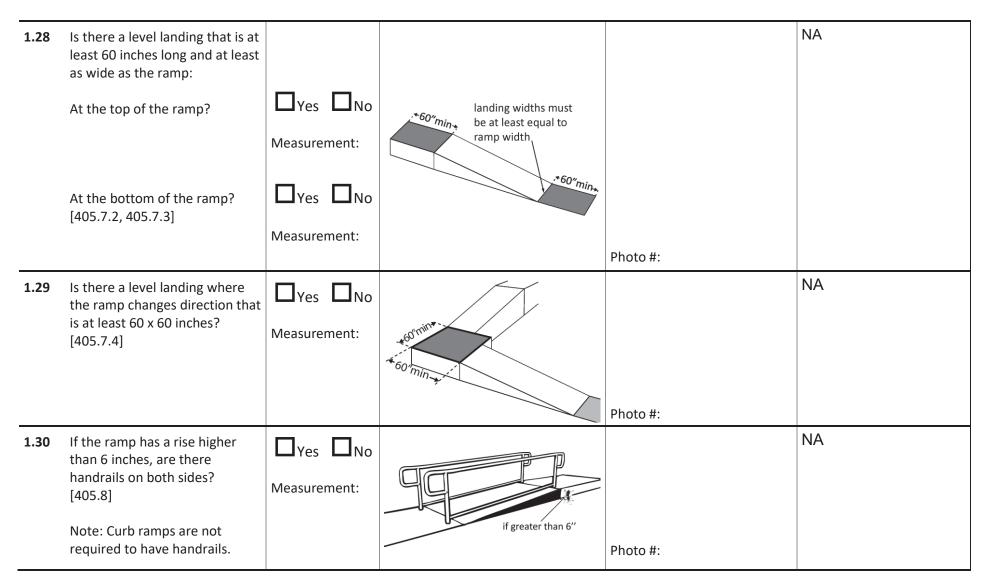
1.11	Are there signs reading "van accessible" at van accessible spaces? [502.6]	☐Yes ☑No	VAN ACCESSBILE	Photo #:	No sign present
1.12	Of the total parking spaces, are the accessible spaces located on the closest accessible route to the accessible entrance(s)? [208.3.1] Note: If parking serves multiple entrances, accessible parking should be dispersed.	Yes 🗖 No		Photo #:	
Exter	ior Accessible Route				
1.13	Is the route stable, firm and slip-resistant? [302.1]	Yes No			
				Photo #:	
1.14	Is the route at least 36 inches wide? [403.5.1]	Ves No Measurement: 66"	36"min		

Instit	stitute for Human Centered Design www.ADAchecklist.org Priority 1 – Approach & Entrance					
1.17	Is the running slope no steeper than 1:20, i.e. for every inch of height change there are at least 20 inches of route run? [403.3] Note: If the running slope is steeper than 1:20, treat as a ramp and add features such as edge protection and handrails.	Yes No Measurement: 7 1/2" rise over 24'		Photo #:		
1.16	If there are grates or openings on the route, are the openings no larger than ½ inches? Is the long dimension perpendicular to the dominant direction of travel? [302.3]	Yes No Measurement: Yes No		Photo #:	NA	
1.15	If the route is greater than 200 feet in length and less than 60 inches wide, is there a passing space no less than 60 x 60 inches? [403.5.3]	Yes No Measurement: 66" & less than 200' in length	36"min 60"min 60"min	Photo #:		
	Note: The accessible route can narrow to 32 inches min. for a max. of 24 inches. These narrower portions of the route must be at least 48 inches from each other.		48"min 424"max	Photo #:		



1.22	Is the curb ramp, excluding flares, at least 36 inches wide? [406.1, 405.5]	Yes No Measurement:	36"min	Photo #:	NA
1.23	At the top of the curb ramp is there a level landing (slope no steeper than 1:48 in all directions) that is at least 36 inches long and at least as wide as the curb ramp? [406.4]	Yes No Measurement:	36"min		NA
	If there are curb ramp flares, are the slopes of the flares no steeper than 1:10, i.e. for every inch of height change there are at least 10 inches of flare run? [406.3]	Yes No Measurement:	\leftarrow 10 min \rightarrow 1	Photo #:	
1.24	If the landing at the top is less than 36 inches long, are there curb ramp flares?	□Yes □No	$\underbrace{-12 \min}_{} 1$		NA
	Are the slopes of the flares no greater than 1:12, i.e. for every inch of height change there are at least 12 inches of flare run? [406.4]	Yes No Measurement:		Photo #:	

Ramp	Ramps If any portion of the accessible route is steeper than 1:20, it should be treated as a ramp. Accessible route slope is less than 1:20				
1.25	If there is a ramp is it at least 36 inches wide? [405.5] Note: If there are handrails, measure between the handrails.	Yes No Measurement:	36"min	Photo #:	NA
1.26	Is the surface stable, firm and slip resistant? [405.4]	Yes No			NA
				Photo #:	
1.27	For each section of the ramp, is the running slope no greater than 1:12, i.e. for every inch of height change there are at least 12 inches of ramp run? [405.2] Note: Rises no greater than 3 inches with a slope no steeper than 1:8 and rises no greater than 6 inches with a slope no steeper than 1:10 are permitted when such slopes are necessary due to space	Yes No Measurement:	1 12 min		NA
	limitations.			Photo #:	

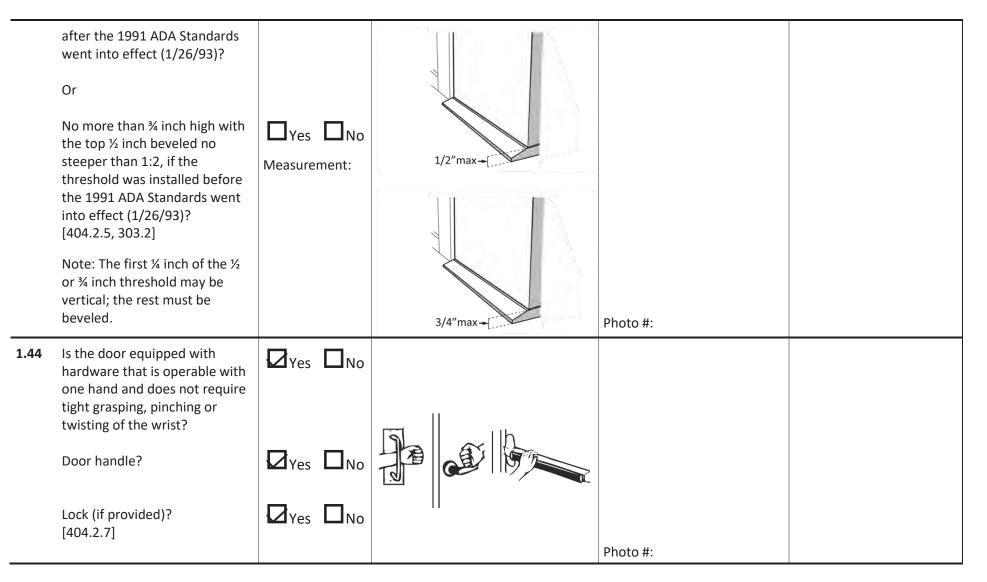


1.31	Is the top of the handrail gripping surface no less than 34 inches and no greater than 38 inches above the ramp surface? [505.4]	Yes No Measurement:	34"-38"	Photo #:	NA
1.32	Is the handrail gripping surface continuous and not obstructed along the top or sides? [505.3] If there are obstructions, is the bottom of the gripping surface obstructed no greater than 20%? [505.6]	Yes No Yes No Measurement:		Photo #:	NA
1.33	If the handrail gripping surface is circular, is it no less than 1 ¼ inches and no greater than 2 inches in diameter? [505.7.1]	Yes No Measurement:	•11/4-2/*	Photo #:	NA
1.34	If the handrail gripping surface is non-circular: Is the perimeter no less than 4 inches and no greater than 6¼ inches?	Yes No Measurement: Yes No Measurement:	4"-6 ¼" perimeter		NA

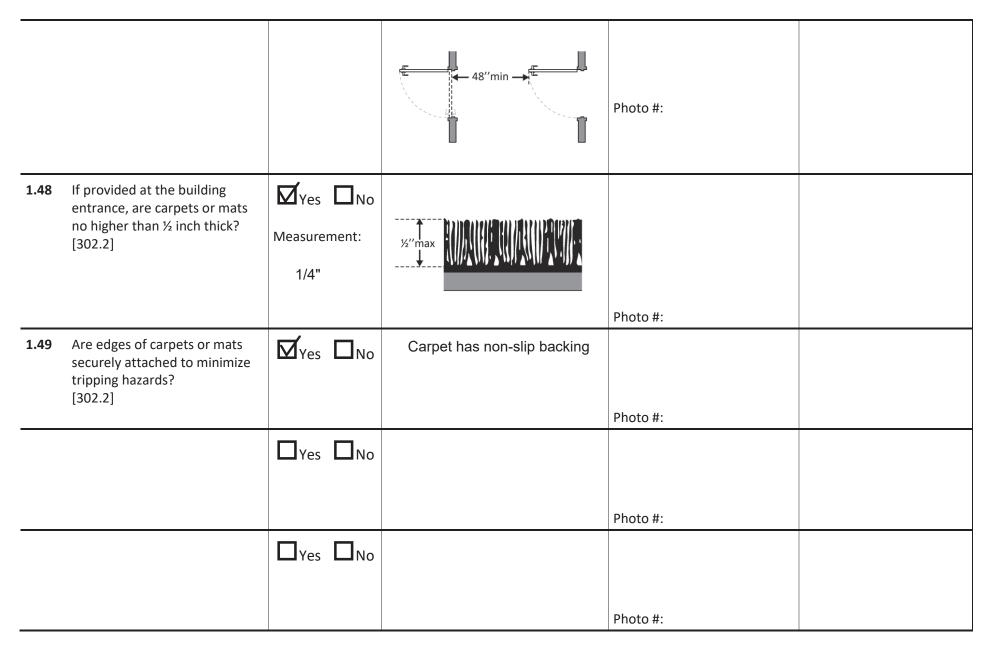
	Is the cross section no greater than 2¼ inches? [505.7.2]	Yes No Measurement:			NA
				Photo #:	
1.35	Does the handrail:				NA
	Extend at least 12 inches horizontally beyond the top and bottom of the ramp?	Yes No Measurement:	P		
	Return to a wall, guard, or landing surface? [505.10.1]	□Yes □No	12"		
	Note: If a 12 inch extension would be a hazard (in circulation path) it is not required.		min	Photo #:	
1.36	To prevent wheelchair casters and crutch tips from falling off:				NA
	Does the surface of the ramp extend at least 12 inches beyond the inside face of the handrail? Or Is there a curb or barrier that prevents the passage of a 4-	Yes No Measurement:	less than 4"		
	inch diameter sphere? [405.9.1, 405.9.2]	Measurement:		Photo #:	

Entra	nce				
1.37	Is the main entrance accessible?	Yes No			
				Photo #:	
1.38	If the main entrance is not accessible, is there an alternative accessible entrance? Can the alternative accessible entrance be used independently and during the	□Yes □No			NA
	same hours as the main entrance?		ill the	Photo #:	
1.39	Do all inaccessible entrances have signs indicating the location of the nearest accessible entrance? [216.6]	□Yes □No	ACCESSIBLE ENTRANCE	Photo #:	NA
1.40	If not all entrances are accessible, is there a sign at the accessible entrance with the International Symbol of Accessibility? [216.6]	□Yes □No	G	Photo #:	NA

1.41	Is the clear opening width of the accessible entrance door at least 32 inches, between the face of the door and the stop, when the door is open 90 degrees? [404.2.3]	Yes No Measurement: 34"	32" min 90°	Photo #:	
1.42	If there is a front approach to the pull side of the door, is there at least 18 inches of maneuvering clearance beyond the latch side plus at least 60 inches clear depth? Note: See 2010 Standards 404.2.4 for maneuvering clearance requirements on the push side of the door and side approaches to the pull side of the door On both sides of the door, is the ground or floor surface of the maneuvering clearance level (no steeper than 1:48)? [404.2.4]	Yes No Measurement: Large open area Yes No Measurement:	60'' min	Photo #:	
1.43	If the threshold is vertical is it no more than ¼ inch high? Or No more than ½ inch high with the top ¼ inch beveled no steeper than 1:2, if the threshold was installed on or	Yes No Measurement: 1/4" Yes No Measurement:	1/4"max-+		



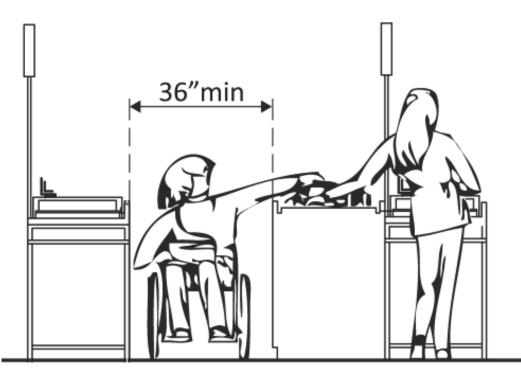
1.45	Are the operable parts of the door hardware no less than 34 inches and no greater than 48 inches above the floor or ground surface? [404.2.7]	Yes No Measurement: 38"	→ 34"- 48"	Photo #:	
1.46	If the door has a closer, does it take at least 5 seconds to close from an open position of 90 degrees to a position of 12 degrees from the latch? [404.2.8]	Yes No Measurement: 5 seconds	90° 5 sec. 5 sec. 5 rin	Photo #:	
1.47	If there are two doors in a series, e.g. vestibule, is the distance between the doors at least 48 inches plus the width of the doors when swinging into the space? [404.2.6]	Yes No Measurement:	$\int \frac{48''\min}{0}$		NA



ADA Checklist for Existing Facilities

Priority 2 – Access to Goods & Services

Based on the 2010 ADA Standards for Accessible Design



Project	SCOG 2022 Self-Evaluation			
Building	SCOG Staff Offices			
Location	315 South 3rd St, Ste 100, Mount Vernon, WA 98273			
Date	4/21/2022			
Surveyors	Grant Johnson, Associate Planner			
Contact Information Grantj@scog.net				

The layout of the building should allow people with disabilities to obtain goods and services and to participate in activities without assistance.



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ADA National Network Questions on the ADA 800-949-4232 voice/tty

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Prio	rity 2 – Access to Goods &	& Services		Comments	Possible Solutions
2.1	Does the accessible entrance provide direct access to the main floor, lobby and elevator? [See 2010 ADA Standards for Accessible Design – 206.4]	MYes DNo	SCOG Staff Offices are on the first floor with direct access to parking lot.	Photo #:	
Inter	ior Accessible Route				
2.2	Are all public spaces on at least one accessible route? [206.2.4]	Yes 🗖 No		Photo #:	
2.3	Is the route stable, firm and slip-resistant? [40.2, 302.1]	Yes 🗖 No	Carpet		
				Photo #:	
2.4	Is the route at least 36 inches wide? [403.5.1] Note: The accessible route can narrow to 32 inches min. for a max. of 24 inches. These narrower portions of the route must be at least 48 inches from each other.	Yes No Measurement: 48" at copier	36"min		

			48"min 48"max	Photo #:	
2.5	If the route is greater than 200 feet in length and less than 60 inches wide, is there a passing space no less than 60 x 60 inches? [403.5.3]	Yes No Measurement:	36"min 60"min 60"min	Photo #:	NA
2.6	Is the running slope no steeper than 1:20, i.e. for every inch of height change there are at least 20 inches of route run? [403.3] Note: If the running slope is steeper than 1:20, treat as a ramp and add features such as edge protection and handrails.	Yes No Measurement:		Photo #:	NA
2.7	Is the cross slope no steeper than 1:48? [403.3]	Yes No Measurement:		Photo #:	NA

2.8	Do all objects on circulation paths through public areas, e.g. fire extinguishers, drinking fountains, signs, etc., protrude no more than 4 inches into the path? Or If an object protrudes more than 4 inches, is the bottom leading edge at 27 inches or lower above the floor? [307.2] Or Is the bottom leading edge at 80 inches or higher above the floor? [307.4]	Yes No Measurement: Yes No Measurement: Yes No Measurement:	Or Or Or Or Or Or Or Or Or Or Or Or Or O	Photo #:	All protruding objects either rest on the floor with the exception of fire extinguishers 26" above floor.
2.9	Are there elevators or platform lifts to all public stories? Note: Vertical access is not required in new construction or alterations if a facility is less than three stories or has less than 3,000 square feet per story, unless the facility is a shopping center, shopping mall,				NA

Priority 2 – Access to Goods & Services

professional office of a health care provider, transportation terminal, state facility or local			
government facility		Photo #:	

Ramp	Ramps						
2.10	If there is a ramp, is it at least 36 inches wide? [405.5] Note: If there are handrails, measure between the handrails.	Yes No Measurement:	36"min	Photo #:	NA		
2.11	Is the surface stable, firm and slip resistant? [405.4]	Yes No			NA		
				Photo #:			
2.12	For each section of the ramp, is the running slope no greater than 1:12, i.e. for every inch of height change there are at least 12 inches of ramp run? [405.2]	Yes No Measurement:	1 12 min		NA		
	Note: Rises no greater than 3 inches with a slope no steeper than 1:8 and rises no greater						

	than 6 inches with a slope no steeper than 1:10 are permitted when due to space limitations.			Photo #:	NA
2.13	Is there a level landing that is at least 60 inches long and at least as wide as the ramp: At the top of the ramp? At the bottom of the ramp? [405.7.2, 405.7.3]	Yes No Measurement: Yes No Measurement:	landing widths must be at least equal to ramp width		NA
				Photo #:	
2.14	Is there a level landing where the ramp changes direction that is at least 60 x 60 inches? [405.7.4]	Measurement:	60" min 60" min	Photo #:	NA

2.15	If the ramp has a rise higher than 6 inches are there handrails on both sides? [405.8]	Yes No Measurement:	if greater than 6"		NA
2.16	Is the top of the handrail gripping surface no less than 34 inches and no greater than 38 inches above the ramp surface? [505.4]	Yes No Measurement:	34''.38''	Photo #: Photo #:	NA
2.17	Is the handrail gripping surface continuous and not obstructed along the top or sides? [505.3] If there are obstructions, is the bottom of the gripping surface obstructed no more than 20%? [505.6]	Yes No Yes No Measurement:		Photo #:	NA
2.18	If the handrail gripping surface is circular, is it no less than 1 ¼ inches and no greater than 2 inches in diameter? [505.7.1]	Yes No Measurement:	•1%-2"	Photo #:	NA

2.19	If the handrail gripping surface is non-circular: Is the perimeter no less than 4 inches and no greater than 6¼ inches? Is the cross section no greater than 2¼ inches in diameter? [505.7.2]	Yes No Measurement:	4"-6 ¼" perimeter	Photo #:	NA
2.20	Does the handrail: Extend at least 12 inches horizontally beyond the top and bottom of the ramp? Return to a wall, guard, or landing surface? [505.10.1] Note: If a 12" extension would be hazardous (in circulation path), it is not required	Yes No Measurement:	12" min	Photo #:	NA
2.21	To prevent wheelchair casters and crutch tips from falling off: Does the surface of the ramp extend at least 12 inches beyond the inside face of the handrail? Or	Yes No Measurement:	12"min less than 4"		NA

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Is there a curb or barrier that prevents the passage of a 4- inch diameter sphere?	Measurement:		
[405.9.1, 405.9.2]		Photo #:	

Eleva	Elevators – Full Size & LULA (limited use, limited application) LULA elevators are often used in alterations.					
2.22	If there is a full size or LULA elevator, are the call buttons no higher than 54 inches above the floor? [407.2.1.1]	Yes No Measurement:	54"max	Photo #:	NA	
2.23	If there is a full size or LULA elevator, does the sliding door reopen automatically when obstructed by an object or person?* [407.3.3]	Yes No		Photo #:	* If constructed before 3/15/2012 and manually operated, the door is not required to reopen automatically NA	

2.24	If there is a LULA elevator with				NA
	a swinging door:				
	Is the door power- operated?	Yes No			
	Does the door remain open for at least 20 seconds when activated? [403.3.2]	Yes No Time:		Photo #:	
2.25	If there is a full size elevator:				NA
	Is the interior at least 54 inches deep by at least 36 inches wide with at least 16 sq. ft. of clear floor area?	Yes No Measurement:	← 36"min→ 16 sq.ft.min 54"min		
	Is the door opening width at least 32 inches? [407.4.1 Exception]	Yes No Measurement:	32″min →	Photo #:	
2.26	If there is a LULA elevator, is the interior:				NA
	At least 51 inches deep by 51 inches wide with a door opening width of at least 36 inches? Or At least 54 inches deep by at least 36 inches wide with at least 15 sq. ft. of clear floor area and a door opening width of at least 32 inches?	Yes No Measurement: Yes No Measurement:	51"min 51" or 54" min 54" min 54" min 54" min 54" min 54" min 54" min 54" min 54" 54" min 54" 54" 54" 54" 54" 54" 54" 54"		
	[408.4.1 Exceptions 1 and 2]			Photo #:	

2.27	If there is a full size or LULA elevator, are the in-car controls: No less than 15 inches and no greater 48 inches above the floor? Or Up to 54 inches above the floor for a parallel approach? [408.4.6, 407.4.6.1]	Yes No Measurement: Yes Yes No Measurement:	Or Or 54"max 15"min	Photo #:	NA
2.28	If there is a LULA elevator, are the in-car controls centered on a side wall? [408.4.6]	Yes No Measurement:		Photo #:	NA
2.29	If there is a full size or LULA elevator: Are the car control buttons designated with raised characters? Are the car control buttons designated with Braille?	□ _{Yes} □ _{No}	5 5 6 6 6 5 5 6 6 6 6 6 6 6 6 6 6		NA

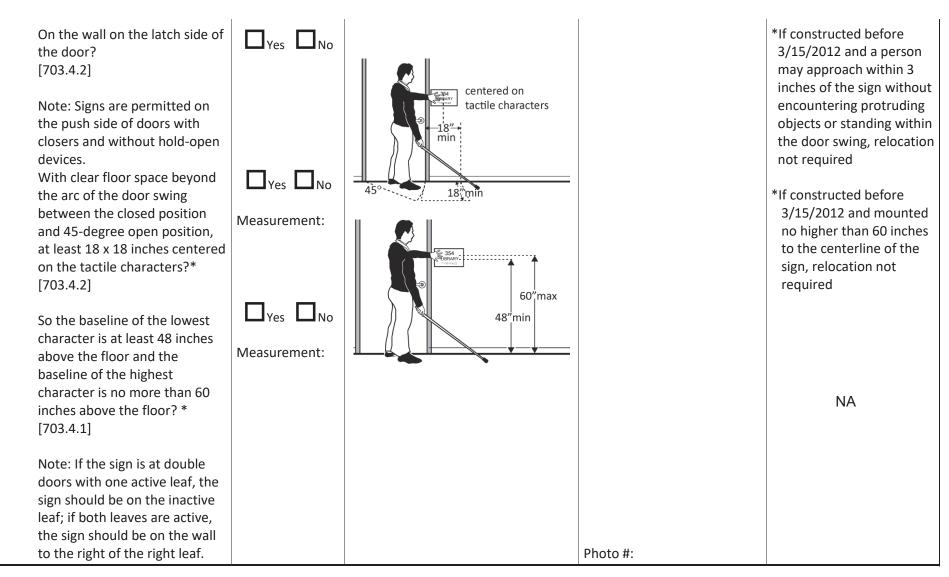
	[407.4.7.1, 703.2]			Photo #:	
2.30	If there is a full size or LULA elevator, are there audible signals which sound as the car passes or is about to stop at a floor? [407.4.8]	□ _{Yes} □ _{No}		Photo #:	NA
2.31	If there is a full size or LULA elevator:				NA
	Is there a sign on both door jambs at every floor identifying the floor?	□ _{Yes} □ _{No}			
	Is there a tactile star on both jambs at the main entry level?	Yes No			
	Do text characters contrast with their backgrounds?	Yes No			
	Are text characters raised?	Yes No	48"min		
	Is there Braille?	Yes No			* If constructed before
	Is the sign mounted between 48 inches to the baseline of the lowest character and 60 inches to the baseline of the highest character above the floor?*	Yes No Measurement:			3/15/2012 and mounted no higher than 60 inches to the centerline of the sign, relocation is not required
	[407.2.3, 408.2.3]			Photo #:	

Platform Lifts

2.32	If a lift is provided, can it be used without assistance from others? [410.1]	Yes No		Photo #:	NA
2.33	Is there a clear floor space at least 30 inches wide by at least 48 inches long for a person using a wheelchair to approach and reach the controls to use the lift? [410.5]	Yes No Measurement:	48"min 30"min	Photo #:	NA
2.34	Are the lift controls no less than 15 inches and no greater than 48 inches above the floor? [410.5]	Yes No Measurement:	15"-48"	Photo #:	NA
2.35	Is there a clear floor space at least 36 inches wide by at least 48 inches long inside the lift? [410.3]	Yes No Measurement:	36 " min 48" min	Photo #:	NA

2.36	If there is an end door, is the clear opening width at least 32 inches? [410.6]	Yes No Measurement:	32 ^m min		NA	
				Photo #:		
2.37	If there is a side door, is the clear opening width at least 42 inches? [410.6]	Yes No Measurement:	42"min	Photo #:	NA	
Signs	"Tactile characters" are read using to	uch, i.e. raised chara	cters and Braille.			
2.38	If there are signs designating permanent rooms and spaces not likely to change over time, e.g. room numbers and letters, room names, and exit signs: [216.2]				Restrooms are the only "permanent" rooms. They are addressed in "Priority 3" of this document. Type te	ext h
	Do text characters contrast with their backgrounds? [703.5]	Yes No	LIBRARY			
	Are text characters raised? [703.2]	Yes No				
	Is there Braille? [703.3]	Yes No				

Priority 2 – Access to Goods & Services



2.39	If there are signs that provide direction to or information about interior spaces: Do text characters contrast with their backgrounds? [703.5.1] Is the sign mounted so that characters are at least 40 inches above the floor? [703.5.6]	Yes No Yes No Measurement:	e HBRARY		NA
	Note: Raised characters and Braille are not required.			Photo #:	
Inter	ior Doors – to classrooms, me	edical exam room	ns, conference rooms, etc.	•	
2.40	Is the door opening width at least 32 inches clear, between the face of the door and the stop, when the door is open 90 degrees? [404.2.3]	Yes No Measurement: 36"	32″ min	Photo #:	
2.41	If there is a front approach to the pull side of the door, is there at least 18 inches of maneuvering clearance beyond the latch side plus at least 60 inches clear depth? Note: See 2010 Standards 404.2.4 for maneuvering clearance requirements on the push side of the door and side approaches to the pull side of the door.	Yes \square No Measurement:	for" min		

	On both sides of the door, is the floor surface of the maneuvering clearance level (no steeper than 1:48)? [404.2.4]	¥es □No Measurement:	Level floors	Photo #:	
2.42	If the threshold is vertical is it no more than ¼ inch high? Or No more than ½ inch high with the top ¼ inch beveled no steeper than 1:2, if the threshold was installed on or after the 1991 ADA Standards went into effect (1/26/93)? Or No more than ¾ inch high with the top ½ inch beveled no steeper than 1:2, if the threshold was installed before the 1991 ADA Standards went into effect (1/26/93)? [404.2.5, 303.2] Note: The first ¼ inch of the ½ or ¾ inch threshold may be vertical; the rest must be beveled.	Yes No Measurement: Yes No Measurement: Yes No Measurement:	1/4"max++++++++++++++++++++++++++++++++++++	Photo #:	NA

2.43	Is the door equipped with hardware that is operable with one hand and does not require tight grasping, pinching or twisting of the wrist? Door handle? Lock (if provided)? [404.2.7]	Yes No Yes No Yes No		Photo #:	
2.44	Are the operable parts of the hardware no less than 34 inches and no greater than 48 inches above the floor? [404.2.7]	Yes No Measurement: 34"	→ → → → → → → → → → → → → → → → → → →	Photo #:	
2.45	Can the door be opened easily (5 pounds maximum force)? [404.2.9] Note: You can use a pressure gauge or fish scale to measure force. If you do not have one you will need to judge whether the door is easy to open.	Yes No Measurement:	5 lbf	Photo #:	
2.46	If the door has a closer, does it take at least 5 seconds to close from an open position of 90 degrees to a position of 12 degrees from the latch? [404.2.8.1]	Yes No Measurement: 5 seconds	90° 5 sec	Photo #:	

switches are by office
and a parallel provided, n be 54 inches

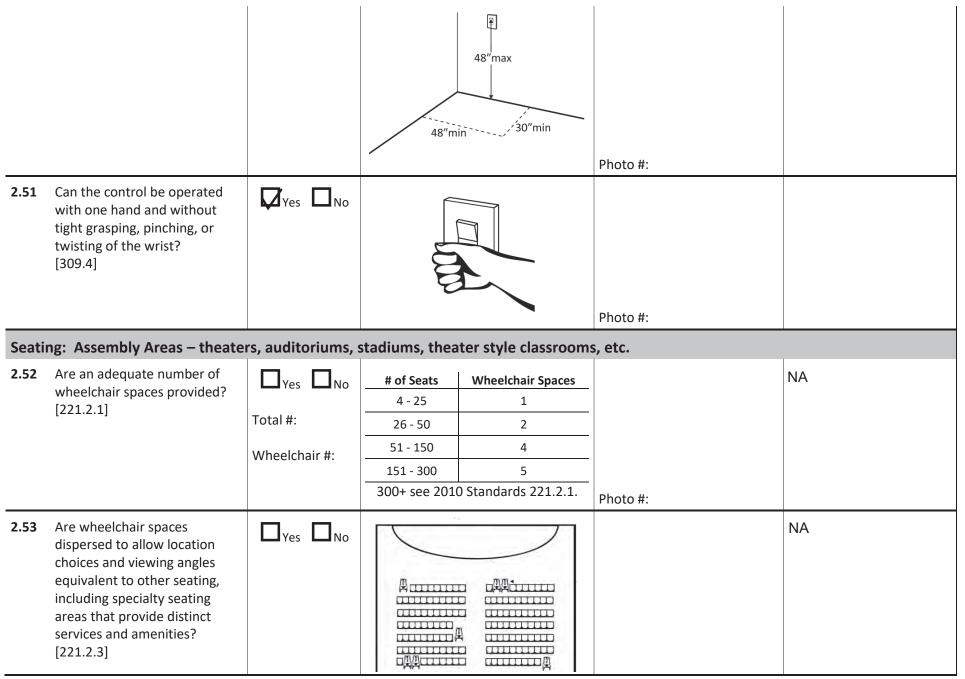


			Photo #:	
2.54	Where people are expected to remain seated, do people in wheelchair spaces have a clear line of sight over and between the heads of others in front of them? [802.2.1.1, 802.1.1.2]	Yes No	Photo #:	NA
2.55	Where people are expected to stand, do people in wheelchair spaces have a clear line of sight over and between the heads of others in front of them? [802.2.2.1, 802.1.2.2]	Yes No	Photo #:	NA
2.56	If there is a single wheelchair space, is it at least 36 inches wide? [802.1.2]	Yes No Measurement:	 Photo #:	NA

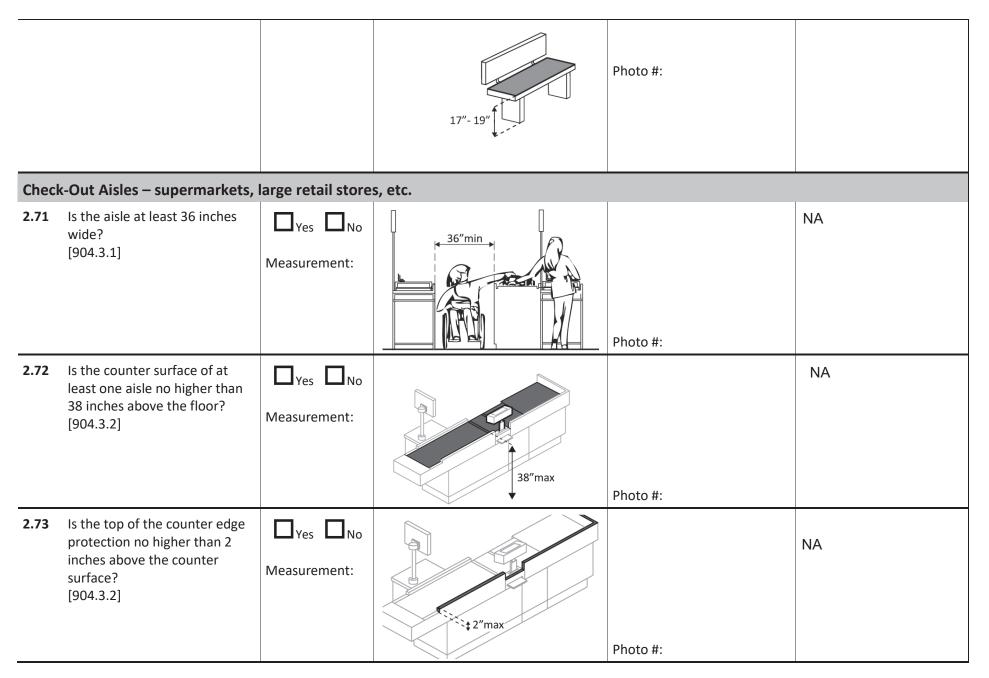
2.57	If there are two adjacent wheelchair spaces, are they each at least 33 inches wide? [802.1.2]	Yes No Measurement:	→ 33"min → 33"min →	Photo #:	NA
2.58	If the wheelchair space can be entered from the front or rear, is it at least 48 inches deep? [802.1.3]	Yes No Measurement:		Photo #:	NA
2.59	If the wheelchair space can only be entered from the side, is it at least 60 inches deep? [802.1.3]	Yes No Measurement:	60"min →	Photo #:	NA
2.60	Do wheelchair spaces adjoin, but not overlap, accessible routes? [802.1.4]	Yes No	Accessibe Route	Photo #:	NA

2.61	Is there at least one companion seat for each	Yes No			NA
	wheelchair space? [221.3]			Photo #:	
2.62	Is the companion seat located so the companion is shoulder- to-shoulder with the person in a wheelchair? [802.3.1]	Yes No		Photo #:	NA
2.63	Is the companion seat equivalent in size, quality, comfort and amenities to seating in the immediate area? [802.3.2]	Yes No		Photo #:	NA
.	-	-		-	
Seati	ng. At dining surfaces (restau	irants cafeterias	bars etc.) and non-employee w	ork surfaces (libraries, confe	erence rooms etc.)
Seati 2.64	ng: At dining surfaces (restaut Are at least 5%, but no fewer than one, of seating and standing spaces accessible for people who use wheelchairs? [226.1]	Yes □No Total #: 16 Wheelchair #:2	, bars, etc.) and non-employee we		erence rooms, etc.)
	Are at least 5%, but no fewer than one, of seating and standing spaces accessible for people who use wheelchairs?	Yes DNo Total #: 16	, bars, etc.) and non-employee we	Photo #:	erence rooms, etc.)

2.66	At the accessible space(s), is the top of the accessible surface no less than 28 inches and no greater than 34 inches above the floor? [902.3] Note: If for children, the top should be no less than 26 inches and no greater than 30 inches above the floor.	Yes No Measurement: 28"	28"-34"	Photo #:	
2.67	Is there a clear floor space at least 30 inches wide by at least 48 inches long for a forward approach? [305.3]	Ves No Measurement:	30"48"	SCOG Meeting Room has long tables that can be easily configured for multiple wheelchair accessible seating options Tables are 27" from floor to bottom with 5' of space from table to wall behind.	NA
	Does it extend no less than 17 inches and no greater than 25 inches under the surface?	Measurement:			
	Is there knee space at least 27 inches high and at least 30 inches wide? [306.2, 306.3]	Yes No Measurement: Tables are 2' x 5'	27"min 30"min 17"- 25"		
	Note: If for children, the knee space may be 24 inches high.			Photo #:	

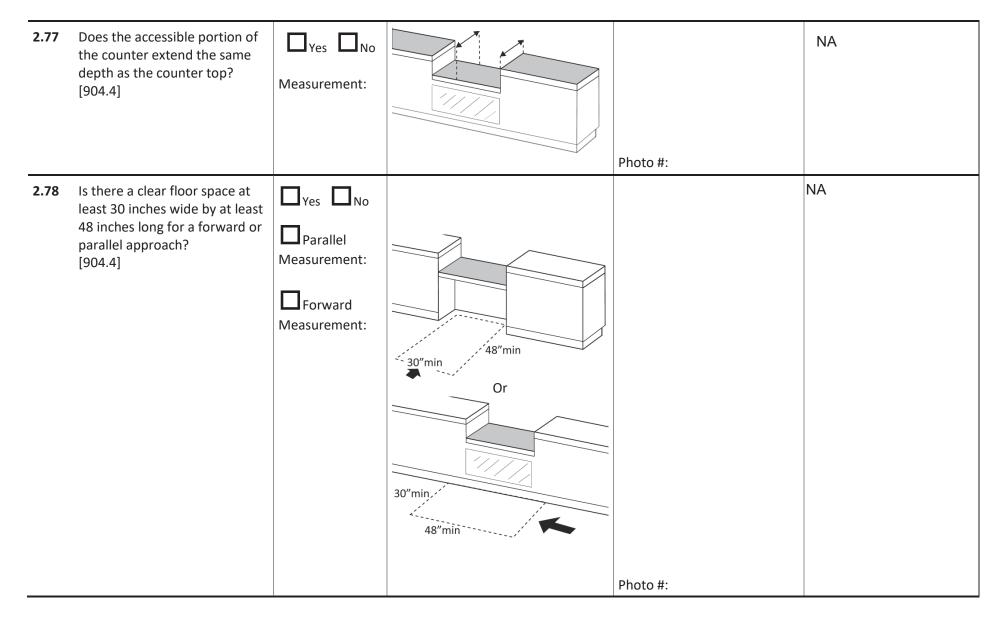
Seating: General – reception areas, waiting rooms, etc.

2.68	Is there at least one space at least 36 inches wide by at least 48 inches long for a person in a wheelchair? [802.1.2, 802.1.3]	Yes No Measurement:	36"x48"	Photo #:	
2.69	In locker rooms, dressing		rooms This section does not apply to any	other benches.	NA
	rooms and fitting rooms, is there at least one room with a bench?	Yes No			
	[222.1, 803.4]			Photo #:	
2.70	Is there a clear floor space at least 30 inches wide by at least 48 inches long at the end of the bench and parallel to the short axis of the bench? Is the bench seat at least 42 inches long and no less than 20 inches and no greater than 24 inches deep? Does the bench have back support or is it affixed to a wall? Is the top of the bench seat no less than 17 inches and no greater than 19 inches above the floor? [903]	Yes No Measurement: Yes No Measurement: Yes No Yes No Measurement:	48" min 30" min 20"- 24"		NA



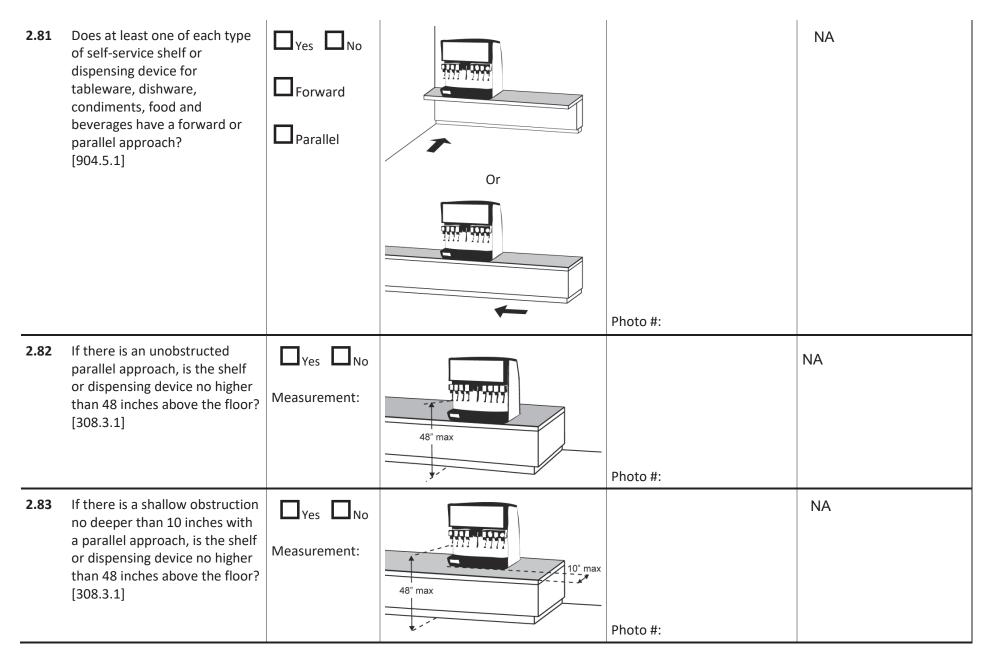
2.74	If there is a check writing surface, is the top no less than 28 inches and no greater than 34 inches above the floor? [904.3.3]	Yes No Measurement:	28"-34"	Photo #:	NA
2.75	If there is more than one check-out aisle is there a sign with the International Symbol of Accessibility at the accessible aisle? [216.11]	☐ _{Yes} ☐ _{No}	E	Photo #:	NA

Sales	Sales & Service Counters – banks, stores, dry cleaners, auto repair shops, fitness clubs, etc.					
2.76	Is there a portion of at least one of each type of counter that is:		36"min		NA	
	No higher than 36 inches above the floor?	Yes No Measurement:	36"max			
	At least 36 inches long? [904.4.1]	Yes No Measurement:		Photo #:		



2.79	For a parallel approach, is the clear floor space positioned with the 48 inches adjacent to the accessible length of counter? [904.4.1]	Yes No Measurement:	48"min	Photo #:	NA
2.80	For a forward approach: Do no less than 17 and no greater than 25 inches of the clear floor space extend under the accessible length of the counter? [306.2.2, 306.2.3]	Yes No Measurement:	17-25" 48"min		NA
	Is there at least 27 inches clearance from the floor to the bottom of the counter? [306.3.1]	Yes No Measurement:	27"min	Photo #:	

Food Service Lines – in cafeterias, salad bars, eat-in fast food establishments, etc.



2.84	If there is an obstruction no less than 10 inches and no greater than 24 inches deep with a parallel approach, is the shelf or dispensing device no higher than 46 inches above the floor? [308.3.2]	Yes No Measurement:	46" max	Photo #:	NA
2.85	If there is an unobstructed forward approach, is the shelf or dispensing device no higher than 48 inches above the floor? [308.2.1]	Yes No Measurement:	48"max	Photo #:	NA
2.86	If there is an obstruction no deeper than 20 inches with a forward approach: Does clear floor space extend under the obstruction that is at least the same depth as the obstruction? Is the shelf or dispensing device no higher than 48 inches above the floor? [904.5.1]	Yes No Measurement: Yes No Measurement:	20"max 20"max 20"min	Photo #:	NA

2.87	If the obstruction is no less than 20 inches and no greater than 25 inches deep with a forward approach: Does clear floor space extend under the obstruction that is at least the same depth as the obstruction? Is the shelf or dispensing device no higher than 44 inches above the floor?	Yes No Measurement: Yes No Measurement:	20"-25" 44" max		NA
2.88	[904.5.1] If there is a tray slide, is the top no less than 28 inches and no greater than 34 inches above the floor? [904.5.2]	Yes No Measurement:	28"-34"	Photo #:	NA
		Yes No		Photo #: Photo #:	
		□ _{Yes} □ _{No}		Photo #:	

The ADA Checklist for Existing Facilities

Priority 3 - Toilet Rooms

Based on the 2010 ADA Standards for Accessible Design

	Project SCOG 2022 Self-Evaluation
	Building 315 South 3rd St, Ste 100, Mount Vernon, WA 98273
	Location SCOG Staff Offices
	Date 4/21/2022
	Surveyors Grant Johnson, Associate Planner
	-
	Contact Information Grantj@scog.net
When toilet rooms are open to the public t disabilities.	hey should be accessible to people with



Institute for Human Centered Design www.HumanCenteredDesign.org

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ADA National Network Questions on the ADA 800-949-4232 voice/tty

This checklist was produced by the New England ADA Center, a project of the Institute for Human Centered Design and a member of the ADA National Network. This checklist was developed under a grant from the Department of Education, NIDRR grant number H133A060092-09A. However the contents do not necessarily represent the policy of the Department of Education, and you should not assume endorsement by the Federal Government.

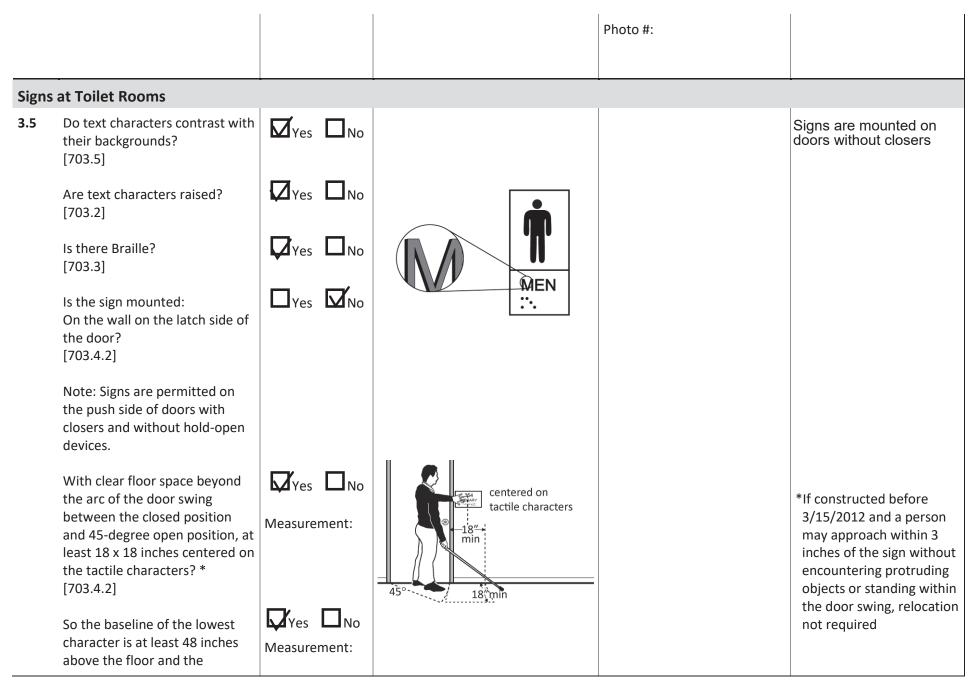
Questions or comments on the checklist contact the New England ADA Center at 617-695-0085 voice/tty or ADAinfo@NewEnglandADA.org

For the full set of checklists, including the checklists for recreation facilities visit www.ADAchecklist.org.

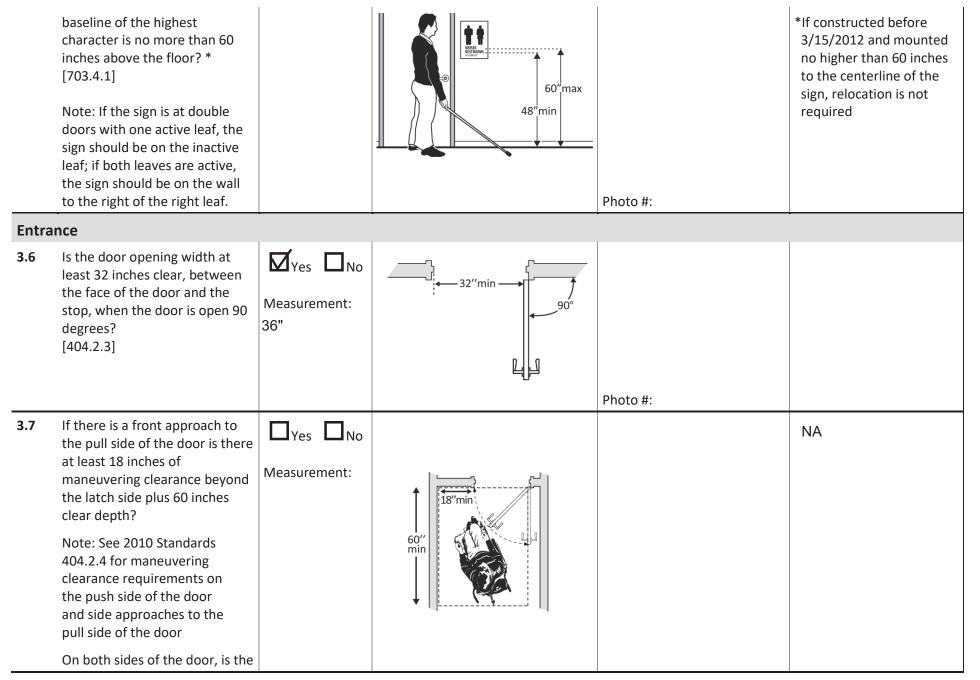
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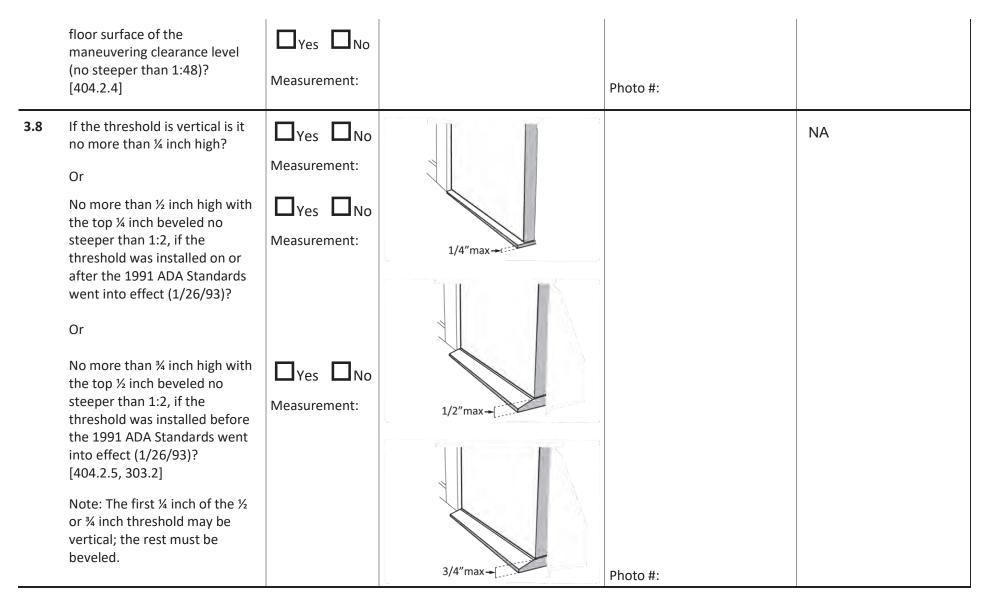
Pric	ority 3 – Toilet Rooms			Comments	Possible Solutions
3.1	If toilet rooms are available to the public, is at least one toilet room accessible? (Either one for each sex, or one unisex.) Note: If toilet rooms are chiefly for children, e.g., in elementary schools and day care centers, use the children's specifications in Toilets - 604.1, 604.8, 604.9, 609.4 and Lavatories and Sinks – 606.2.	Q Yes □ No		Photo #:	
3.2	Are there signs at inaccessible toilet rooms that give directions to accessible toilet rooms? [See 2010 ADA Standards for Accessible Design – 216.8]	Yes No		- Photo #:	NA
3.3	If not all toilet rooms are accessible, is there a sign at the accessible toilet room with the International Symbol of Accessibility? [216.8]	□ _{Yes} □ _{No}	E	Photo #:	NA
Acce	ssible Route				
3.4	Is there an accessible route to the accessible toilet room? [206.2.4]	Kyes 🗖 No			
Instit	ute for Human Centered Design		www.ADAchecklist.org		Priority 3 – Toilet Rooms

Priority 3 – Toilet Rooms

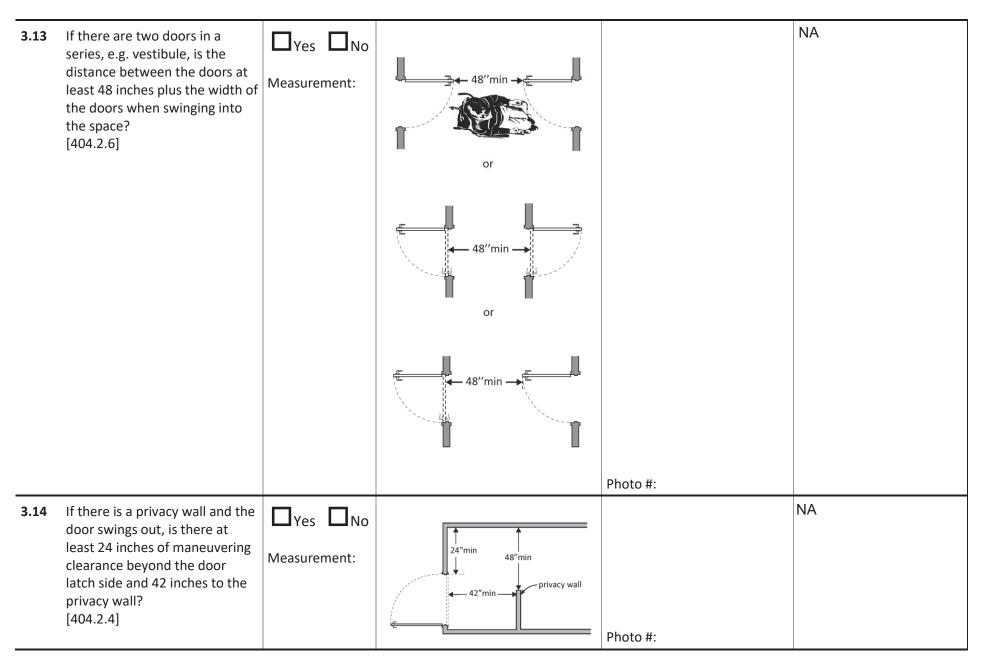


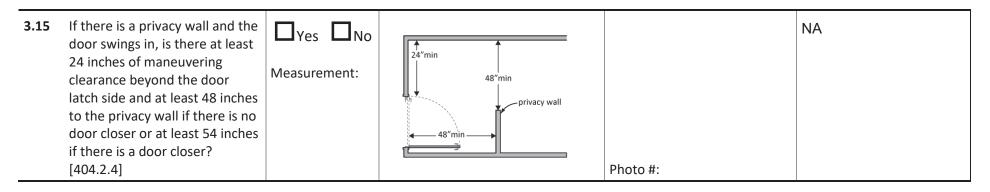
Priority 3 – Toilet Rooms





3.9	Is the door equipped with hardware that is operable with one hand and does not require tight grasping, pinching or twisting of the wrist? Door handle? Lock (if provided)? [404.2.7]	 ✓Yes ✓No ✓Yes ✓No 		Photo #:	
3.10	Are the operable parts of the door hardware mounted no less than 34 inches and no greater than 48 inches above the floor? [404.2.7]	Yes No Measurement: 34"	<i>∎</i> 34"- 48"	Photo #:	
3.11	Can the door be opened easily (5 pounds maximum force)? [404.2.9] Note: You can use a pressure gauge or fish scale to measure force. If you do not have one you will need to judge whether the door is easy to open.	Ves No Measurement: Opened with very slight force	5 lbf	Photo #:	
3.12	If the door has a closer, does it take at least 5 seconds to close from an open position of 90 degrees to a position of 12 degrees from the latch? [404.2.8.1]	Yes No Measurement:	90° 55°	Photo #:	NA





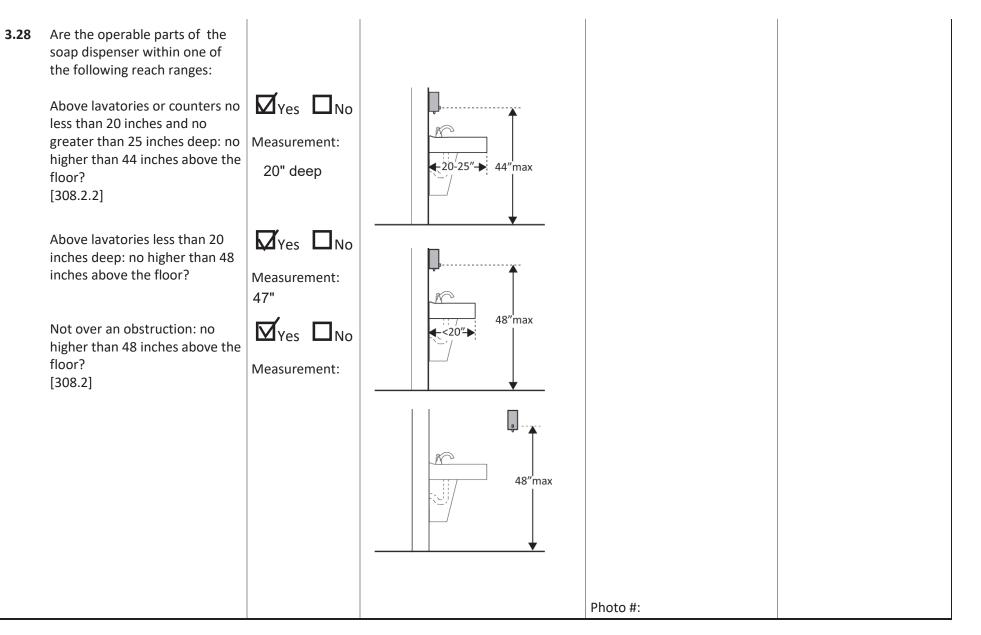
3.16	Is there a clear path to at least	Yes DNo			
	one of each type of fixture, e.g. lavatory, hand dryer, etc., that is at least 36 inches wide? [403.5.1]	Measurement: 36"	36"min	Photo #:	
3.17	Is there clear floor space available for a person in a wheelchair to turn around, i.e. a circle at least 60 inches in diameter or a T-shaped space within a 60-inch square? [603.2.1]	Yes No Measurement: 8' x 5'	60"min 36" ⊑ 24" base 436"min ►		

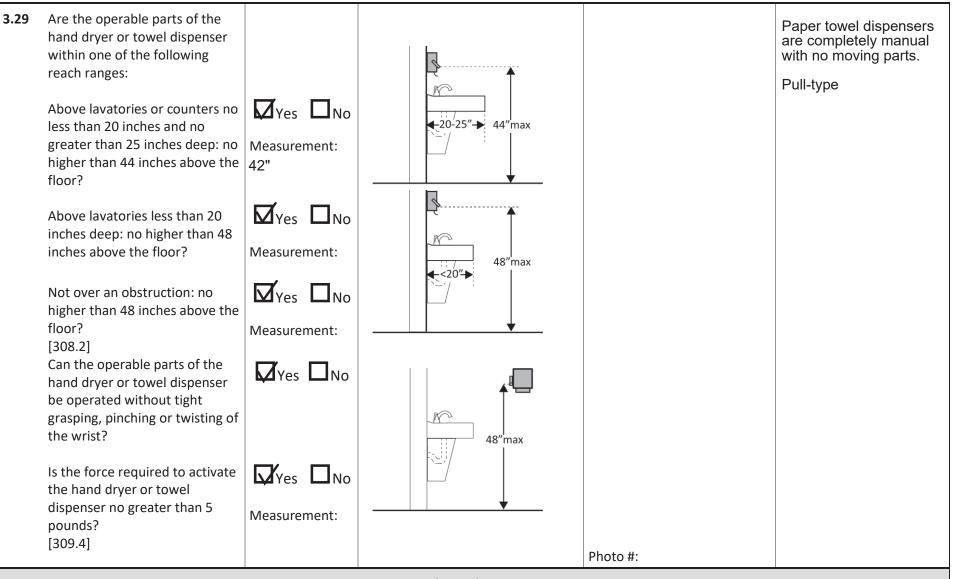
3.18	In a single user toilet room if the door swings in and over a clear floor space at an accessible fixture, is there a clear floor space at least 30 x 48 inches beyond the swing of the door? [603.2.3 Exception 2]	Ves No Measurement: 6'		Photo #:	
3.19	If the mirror is over a lavatory or countertop, is the bottom edge of the reflecting surface no higher than 40 inches above the floor? Or If the mirror is not over the lavatory or countertop, is the bottom edge of the reflecting surface no higher than 35 inches above the floor?* [603.3]	✓Yes No Measurement: 40" ✓Yes No Measurement:	- mArr 40" max	Photo #:	* If installed before 3/15/2012 and the bottom edge of the reflecting surface is no higher than 40 inches above the floor, lowering the mirror to 35 inches is not required
3.20	If there is a coat hook, is it no less than 15 inches and no greater than 48 inches above the floor?* [603.4]	Yes No Measurement:	48"max 15"min	Photo #:	NA * If installed before 3/15/2010 and the clear floor space allows a parallel approach, the coat hook may be 54 inches above the floor.

Lavat	Lavatories The 2010 Standards refer to sinks in toilet rooms as lavatories.							
3.21	Does at least one lavatory have a clear floor space for a forward approach at least 30 inches wide and 48 inches long? [606.2]	Yes No Measurement: 8' long over 36" wide	48"min 48"min 30"min	Photo #:				
3.22	Do no less than 17 inches and no greater than 25 inches of the clear floor space extend under the lavatory so that a person using a wheelchair can get close enough to reach the faucet? [306.2]	Measurement:	48″ →	Photo #:				
3.23	Is the front of the lavatory or counter surface, whichever is higher, no more than 34 inches above the floor? [606.3]	Ves No Measurement: 34"	34"max	Photo #:				
3.24	Is there at least 27 inches clearance from the floor to the bottom of the lavatory that extends at least 8 inches under the lavatory for knee clearance? [306.3.3]	Ves No Measurement: 29" high 8" deep	₩ # 8" min 27"min	Photo #:				

3.25	Is there toe clearance at least 9 inches high? [306.3.3] Note: Space extending greater than 6 inches beyond the available toe clearance at 9 inches above the floor is not considered toe clearance.	Ves C		9"" -6"+ min" max 48"	Photo #:	
3.26	Are pipes below the lavatory insulated or otherwise configured to protect against contact? [606.5]	Ves C	No		Photo #:	
3.27	Can the faucet be operated without tight grasping, pinching, or twisting of the wrist? Is the force required to activate the faucet no greater than 5 pounds? [606.4]	¥yes C			Photo #:	

Soap Dispensers and Hand Dryers

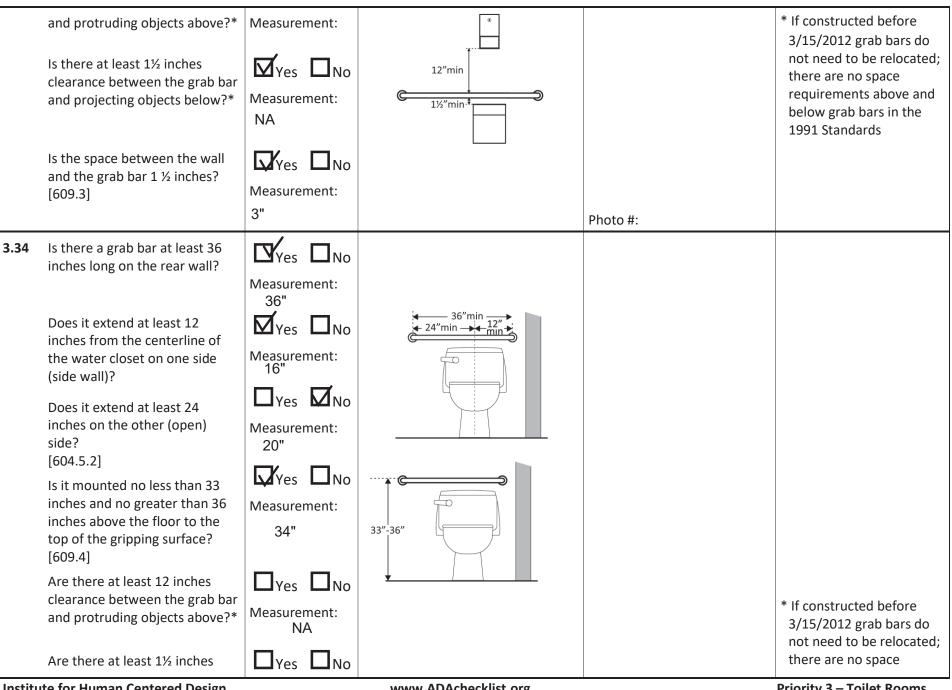




Water Closets in Single-User Toilet Rooms and Compartments (Stalls) The 2010 Standards refer to toilets as water closets.

3.30	Is the centerline of the water closet no less than 16 inches and no greater than 18 inches from the side wall or partition? [604.2]	Yes No Measurement: 18"		Photo #:	
3.31	Is clearance provided around the water closet measuring at least 60 inches from the side wall and at least 56 inches from the rear wall?* [604.3.1]	Ves No Measurement: 8' deep 68" wide to sink	56"min		* If constructed before 3/15/12, clearances around water closets in single user toilet rooms can be 48 inches wide by 66 inches long or 48 inches wide by 56 inches long (depending on the approach to the water closet, see 1991 Standards Figure 28) and the lavatory may overlap that clearance if the door to the room does not swing into the required clearances at fixtures (such as lavatories, water closet and urinals) and the edge of the lavatory is at least 18 inches from the centerline of the water closet

				Photo #:	
3.32	Is the height of the water closet no less than 17 inches and no greater than 19 inches above the floor measured to the top of the seat? [604.4]	Yes No Measurement: 18"	17"-19"	Photo #:	
3.33	Is there a grab bar at least 42 inches long on the side wall?	Yes No Measurement:	≤ <u>12″</u> 54″min — →		
	Is it located no more than 12 inches from the rear wall?	42" ✓Yes □No Measurement: 3"	42"min →		
	Does it extend at least 54 inches from the rear wall? [604.5.1]	Yes No Measurement: 45"			
	Is it mounted no less than 33 inches and no greater than 36 inches above the floor to the top of the gripping surface? [609.4]	Yes No Measurement: 34"	33"-36"		
	Is there at least 12 inches clearance between the grab bar	Yes No NA			



	clearance between the grab bar and projecting objects below?* Is the space between the wall and the grab bar 1½ inches? [609.3]	Measurement: NA Ves No Measurement: 3"	12"min	Photo #:	requirements above and below grab bars in the 1991 Standards
3.35	If the flush control is hand operated, is the operable part located no higher than 48 inches above the floor? [604.6]	Yes No Measurement: 26 1/2"	48"max	Photo #:	
3.36	If the flush control is hand operated, can it be operated with one hand and without tight grasping, pinching, or twisting of the wrist? Is the force required to activate the flush control no greater	 ✓Yes □No ✓Yes □No Measurement: 			
	than 5 pounds? [605.4]	Measurement.		Photo #:	
3.37	Is the flush control on the open side of the water closet? [604.6]	Yes 🗖 No	← open side →	Photo #:	

3.38	Is the toilet paper dispenser located no less than 7 inches and no greater than 9 inches from the front of the water closet to the centerline of the dispenser?* [604.7]	Yes V No Measurement:		Photo #:	* If constructed before 3/15/2012 dispenser does not need to be relocated if it is within reach from the water closet seat; the 1991 Standards do not specify distance from the front of the water closet Centerline of dispenser is flush with front of water closet
3.39	Is the outlet of the dispenser: Located no less than 15 inches and no greater than 48 inches above the floor? Not located behind grab bars? [604.7]	Yes □No Measurement: 24" Yes □No	48" max outlet 15" min	Photo #:	
3.40	Does the dispenser allow continuous paper flow? [604.7]	Ves 🗖 No		Photo #:	
Toile	t Compartments (Stalls)				

3.41	Is the door opening width at least 32 inches clear, between the face of the door and the stop, when the door is open 90 degrees? [604.8.1.2]	Yes No Measurement:	90° 32″min	Photo #:	NA
3.42	If there is a front approach to the pull side of the door, is there at least 18 inches of maneuvering clearance beyond the latch side plus 60 inches clear depth? [604.8.1.2] Note: See 2010 Standards 604.8.1.2 Doors for maneuvering clearance requirements on the push side of the door and side approaches to the pull side of the door	Yes No Measurement:	18"min 60"min	Photo #:	NA
3.43	Is the door self-closing? [604.8.1.2]	□Yes □No		Photo #:	NA

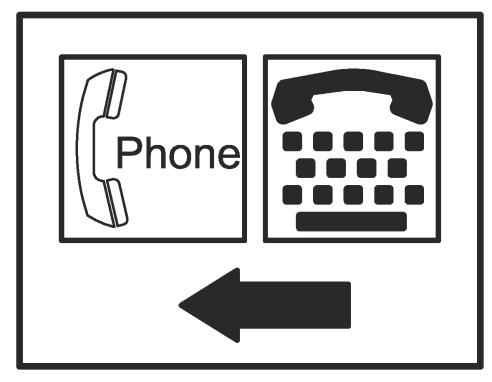
3.44	Are there door pulls on both sides of the door that are operable with one hand and do not require tight grasping pinching or twisting of the wrist?* [604.8.1.2]	□Yes □No			* If constructed before 3/15/2012 door pulls do not need to be added; door pulls are not required in the 1991 Standards NA
3.45	Is the lock operable with one hand and without tight	Yes No		Photo #:	NA
	grasping, pinching or twisting of the wrist? [309.4]				
				Photo #:	
3.46	Are the operable parts of the door hardware mounted no less	Yes No			NA
	than 34 inches and no greater than 48 inches above the floor? [404.2.7]	Measurement:	0		
				Photo #:	
3.47	Is the compartment at least 60 inches wide?	Yes No			NA
	[604.8.1.1]	Measurement:	60"min		
				Photo #:	

3.48	If the water closet is wall hung, is the compartment at least 56 inches deep? [604.8.1.1]	Yes No Measurement:	56″min→	Photo #:	NA
3.49	If the water closet is floor mounted, is the compartment at least 59 inches deep? [604.8.1.1]	Yes No Measurement:	59"min	Photo #:	NA
3.50	If the door swings in, is the minimum required compartment area provided beyond the swing of the door (60 inches x 56 inches if water closet is wall hung or 59 inches if water closet is floor mounted)? [604.8.1.1]	Yes No Measurement:	60"min	Photo #:	NA

ADA Checklist for Existing Facilities

Priority 4 – Additional Access

Based on the 2010 ADA Standards for Accessible Design



Project	SCOG 2022 Self-Evaluation
Building	SCOG Staff Offices
Location	315 South 3rd St, Ste 100, Mount Vernon, WA 98273
Date	4/21/2022
Surveyors	Grant Johnson, Associate Planner
Contact Information Grantj@scog.net	

Amenities such as drinking fountains and public telephones should be accessible to people with disabilities.



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ADA National Network Questions on the ADA 800-949-4232 voice/tty

This checklist was produced by the New England ADA Center, a project of the Institute for Human Centered Design and a member of the ADA National Network. This checklist was developed under a grant from the Department of Education, NIDRR grant number H133A060092-09A. However the contents do not necessarily represent the policy of the Department of Education, and you should not assume endorsement by the Federal Government.

Questions or comments on the checklist contact the New England ADA Center at 617-695-0085 voice/tty or ADAinfo@NewEnglandADA.org

For the full set of checklists, including the checklists for recreation facilities visit www.ADAchecklist.org.

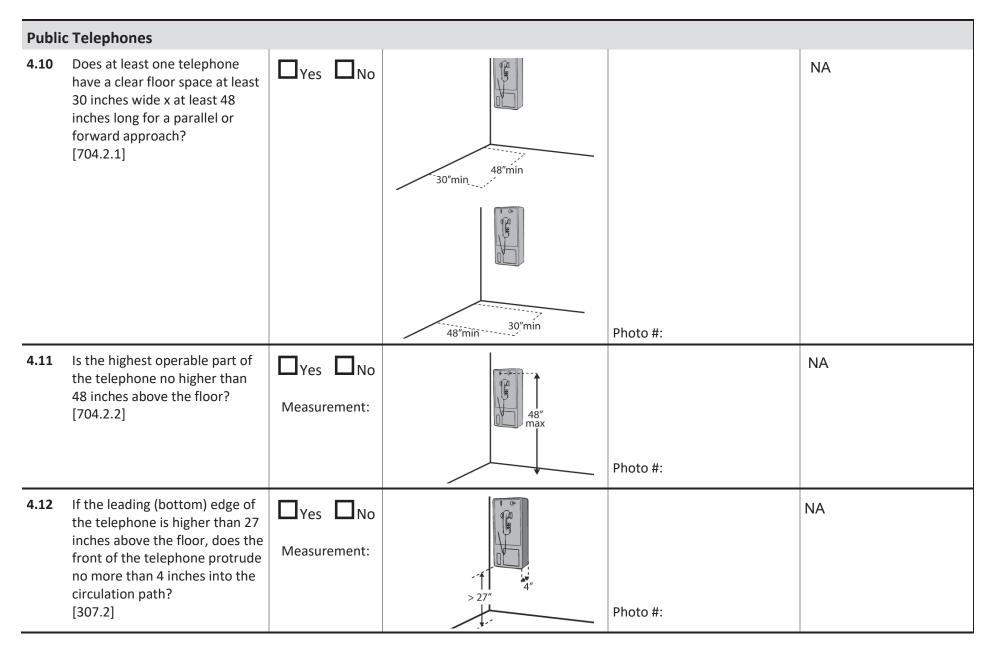
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Pric	ority 4 – Additional Access			Comments	Possible Solutions
Drin	king Fountains				
4.1	Does at least one drinking fountain have a clear floor space at least 30 inches wide x at least 48 inches long centered in front of it for a forward approach?* [See 2010 ADA Standards for Accessible Design – 602.2]	Yes No Measurement:	48"min		*If installed before 3/15/2012, a parallel approach is permitted and the clear floor space is not required to be centered NA
				Photo #:	
4.2	If there is a forward approach, do no less than 17 inches and no greater than 25 inches of the clear floor space extend under the drinking fountain? [306.2.2, 306.2.3]	Yes No Measurement:			NA
	Note: If the drinking fountain is primarily for children's use and the spout is no more than 30 inches above the floor and no more than 3 ½ inches from the edge of the unit, a parallel approach is permitted.		17"-25"	Photo #:	

4.3	If the drinking fountain is no deeper than 20 inches, are the operable parts no higher than 48 inches above the floor? [308.2.2]	Yes No Measurement:	20" max	Photo #:	NA
4.4	If the drinking fountain is no less than 20 inches and no greater than 25 inches deep, are the operable parts no higher than 44 inches above the floor? [308.2.2]	Yes No Measurement:	20"min to 25"max o o 44" max	Photo #:	NA
4.5	Can the control be operated with one hand and without tight grasping, pinching or twisting of the wrist? Is the force required to activate the control no more than 5 pounds? [309.4]	Yes No Yes No Measurement:		Photo #:	NA
4.6	Is the spout outlet no higher than 36 inches above the floor? [602.4]	Yes No Measurement:	36" max	Photo #:	NA

www.ADAchecklist.org

4.7	Is the spout:				NA
	At least 15 inches from the rear of the drinking fountain? No more than 5 inches from the front of the drinking fountain? [602.5]	Yes No Measurement: Yes No Measurement:			
		weddarennent.		Photo #:	
4.8	If there is more than one drinking fountain, is there at least one for standing persons? [211.2] Is the spout outlet no lower than 38 inches and no higher than 43 inches above the floor? [602.7]	Yes No Yes No Measurement:	38" to 43"	Photo #:	NA
4.9	If the leading (bottom) edge of the fountain is higher than 27 inches above the floor, does the front of the fountain protrude no more than 4 inches into the circulation path? [307.2]	Yes No Measurement:	27"	Photo #:	NA



4.13	Does at least one telephone have a volume control? [704.3]	□Yes □No	PRESS TO CHANGE VOLUME 3 LEVELS	Photo #:	NA
4.14	Is the volume control identified by a pictogram of a telephone handset with radiating sound waves? [703.7.2.3]	Yes 🗆 No		Photo #:	NA
4.15	Does at least one telephone have a TTY? [217.4.1] Note: TTY's are devices that employ interactive text-based communication through the transmission of coded signals across the telephone network. They are mainly used by people who are deaf and/or cannot speak.	□Yes □No		Photo #:	NA
4.16	Is the touch surface of the TTY keypad at least 34 inches above the floor? [704.4.1] Note: If a seat is provided, the TTY is not required to be 34 inches minimum above the floor.	Yes No Measurement:	34"min	Photo #:	NA

4.17	Is the TTY identified by the International Symbol of TTY? [703.7.2.2]	□Yes □No		Photo #:	NA
4.18	Do signs that provide direction to public telephones also provide direction to the TTY? [216.9.2]	□Yes □No	Phone	Photo #:	NA
4.19	Do telephones that do not have a TTY provide direction to the TTY? [216.9.2]	□Yes □No		Photo #:	NA
Fire A	larm Systems				
4.20	If there are fire alarm systems, do they have both flashing lights and audible signals? [702.1]	□Yes □No	FIRE	Photo #:	NA

Departments and Programs

	Skagit Council of Governments		4/21/2022	
Public Entity			Date	
	Grant Johnson	grantj@scog.net	(360)416-6678	
Contact Perso	on	Email	Phone	

To begin the self-evaluation, list all the public entity's departments and programs. Evaluate each of these.

Departments and Programs	Staff Liaison	Evaluation Date	Comments
Transportation Planning	Kevin Murphy	4/21/2022	No barriers identified
Growth Management Act Administration	Kevin Murphy	4/21/2022	No barriers identified

Departments and Programs	Staff Liaison	Evaluation Date	Comments

Staff Liaison	Evaluation Date	Comments
	Staff Liaison	Staff LiaisonEvaluation Date </td

Administrative Requirements

Public Entity	Skagit Council of Governments		Date	4/21/2022
Contact Person	Grant Johnson	Email grantj@scog.net	Phone	(360)416-6678

Title II requires that public entities undertake five administrative steps to promote implementation of the ADA.

Questions		Comments	Next Steps
 Has a self-evaluation been conducted? (Required no matter the number of employees.) 	Yes 🚺 No 📄 2	2003, 4/2022	
2. Is public notice that the public entity does not discriminate on the basis of disability provided in print and audio formats? (Required no matter the number of employees.) Methods may include the website, social media such as Twitter and Facebook, print notices at facilities and in local newspapers, program announcements, public service announcements on local radio and television stations.	Yes No ✔		Publish ADA Notice on website
3. Has a grievance procedure been adopted to resolve disability-related complaints? (Required if 50 or more employees.)	Yes 🗌 No 🖌		Publish Grievance Procedure
 Has at least one employee been appointed to coordinate the public entity's ADA obligations - ADA Coordinator? (Required if 50 or more employees.) 	Yes 🗌 No 🖌		Designate ADA Coordinator

Questions	Comments	Next Steps
 Has a transition plan been developed to address barriers in facilities that affect equal participation of people with disabilities in the public entity's programs, activities and services? (Required if 50 or more employees.) 	NA	Create Action Plan per WSDOT guidance

Effective Communication Public Entity Skagit Council of Governments Date 4/21/2022 Contact Person Grant Johnson Email grantj@scog.net Phone (360)416-6678 Many people who are blind or have low vision, who are deaf or hard of hearing or who have other communication disabilities are prevented from participating fully in programs, activities and services because of communication issues. To address this Title II requires that communication with people with disabilities be "as effective" as communication with others. Often good communication

practices will suffice, such as not turning away when speaking with a person who is hard of hearing or taking the time to listen to a person who has a speech impairment. Other times a public entity needs to provide "auxiliary aids and services" to ensure that communication is effective.

Questions		Comments	Next Steps
 Auxiliary Aids and Services Use the Comments column to indicate how aides and services are provided. For example: Arranged through State Commission for the Deaf, rented from XYZ Company, available from the County Disability Office. 1. Does the public entity know how to provide the following for people who are deaf or hard of hearing: 			Identify an interpreter
a. Sign language, oral, and cued speech interpreters	Yes No 🖌		
b. Video remote interpreting (VRI) services	Yes No		Identify VRI service
c. Computer-assisted real-time transcription (CART) services	Yes No 🖌		Identify CART service

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Questions		Comments	Next Steps
d. Assistive listening devices	Yes 🗌 No 🖌		
e. Open and closed captioning of videos	Yes No 🗸		
f. Real time captioning of television programs	Yes 🗌 No 🖌		
g. Other:	Yes No		
2. Does the public entity know how to provide documents in the following formats for people who are blind or visually impaired and others with print disabilities:			
a. Braille	Yes No		
b. Large print	Yes 🖌 No 🗌		
c. Audio recordings	Yes 🖌 No		
d. Accessible electronic formats that that can be accessed by screen reading software, for example, documents in plain text or HTML	Yes No 🗸		Will train staff to create accessible pdf files
 Screen reader software installed on a computer that is used by the public, for example in a library 	Yes No	NA	
f. Magnification software installed on a computer that is used by the public, for example in a computer lab	Yes No	NA	
g. Optical readers	Yes No	NA	

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Questions		Comments	Next Steps
h. Other	Yes No	NA	
Policies and Procedures			
3. Does the public entity have a policy or procedure to handle requests for auxiliary aids and services?	Yes 🗌 No 🖌		Will create procedure
4. Are employees and officials aware of the public entity's obligation to provide auxiliary aids and services?	Yes 🖌 No 🗌		
 Do employees and officials know how to arrange for auxiliary aids and services? Arrangements could be made directly or through the ADA coordinator or another staff person. 	Yes 🗌 No 🖌		Will create procedure
6. Does the public entity give primary consideration to the person with a disability when determining what type of auxiliary aid or service to provide?	Yes 🖌 No 🗌		
7. Are employees and officials aware that it is inappropriate to request that family members and friends of people who are deaf serve as sign language interpreters, except in emergencies or if the individual wants the family member or friend to interpret and it's appropriate to do so?	Yes 🖌 No		
8. Are employees and officials aware that a companion of a program participant has a right to auxiliary aids and services if the companion has a communication disability and is an appropriate person with whom the public entity should or would communicate? Example: A deaf family member of a hospital patient might need a	Yes ✔ No 🗌		

Questions		Comments	Next Steps
sign language interpreter to communicate with the doctor.			
9. Are captions and audio description provided on videos and television programs the public entity produces and videos on its website?	Yes 🗌 No 🖌		
 10. Does the public entity have a policy or procedure for determining if an auxiliary aid or service would be an undue financial and administrative burden? The decision of undue hardship must be made by the head of the public entity or his or her designee. There must be a written statement explaining the reasons for reaching that decision. 	Yes No		Will create procedure
Telecommunications	1		1
11. Do employees and officials know how to respond to telephone calls made through Video Relay Services and Telecommunication Relay Services so that the calls are responded to in the same manner as other telephone calls?	Yes 🗌 No 🖌		Staff training
 12. Where telephones are available to the public for making outgoing calls, such as in hospital waiting rooms, are TTYs available for people with hearing and speech disabilities? A TTY is an electronic device for text communication over a telephone line that is designed for use by people with hearing or speech disabilities. 	Yes No	NA	
13. Do telephone emergency services, including 911, provide direct access to people who use TTYs and computer modems?	Yes No	NA	
Other		1	<u> </u>

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General Nondiscrimination

Public Entity	Skagit Council of Governments		Date	5/12/2022
Contact Perso	Grant Johnson n	grantj@scog.net Email	Phone	(360)416-6678

Title II of the ADA requires that people with disabilities are assured an equal opportunity to participate in the services, programs and activities offered by public entities. This part of the Title II regulations covers a wide range of issues as you will see from the questions below.

Qu	estions		Comments	Next Steps
1.	Do policies, practices and procedures provide an equal opportunity for people with disabilities to participate in services, programs and activities; that is, do policies not discriminate against people on the basis of disability?	Yes 🖌 No		
	Examples: A school district requires that students with autism have a parent accompany them on school trips. This is a discriminatory practice.			
	A city has a policy that applicants for a hunting license have a valid, state-issued driver's license. This is a discriminatory policy.			
2.	Are there circumstances in which the participation of a person with a disability would be excluded or restricted?	Yes 🖌 No	Visually & Hearing impaired persons may have difficulty attending	Create provisions for visually and hearing impaired at SCOG meetings
	If yes, are the exclusions or restrictions necessary to the operation of the program or to the safety of other participants?	Yes No 🗸		
	Please explain:			

Q	uestions		Comments	Next Steps
4.	Are there separate services, programs or activities for people with disabilities or a class of people with disabilities?	Yes 🗌 No 🖌		
	Examples: A municipal recreation department has a wheelchair basketball program. A county museum has a tour for people who are blind with an opportunity to touch sculptures. These are not discriminatory.			
	If yes, please describe:			
Со	ntracting with External Organizations			
5.	Do all employees who contract with outside agencies, organizations or businesses know that the public entity's ADA obligations apply whether the public entity provides the service, program or activity directly or contracts for it?	Yes 🖌 No	All contracts carry nondiscrimination language	
	Example: If a state department of emergency services funds a private organization to provide emergency shelters, the department maintains its ADA obligations to make sure people with disabilities receive the same services as people without disabilities.			
6.	Does the public entity notify each contractor of its responsibilities for providing contracted services in a nondiscriminatory manner?	Yes 🖌 No		
	If yes, please describe:			
7.	Does the public entity require assurances from contractors of their fulfillment of Title II requirements?	Yes 🖌 No		
8.	Are there procedures to ensure that contractors provide the services, programs and activities in a nondiscriminatory manner consistent with	Yes 🔽 No 🗌		

Questions		Comments	Next Steps
the Title II requirements?			
If yes, please describe:			
Reasonable Modifications			
 9. Are employees and officials aware that the public entity is obligated to make a reasonable modification in policies, practices, or procedures if the modification is necessary for a person with a disability to participate? Example: No food or beverages are allowed to be consumed at a regional transit authority's subway stations or in subway cars. In order to control blood sugar levels, a person with diabetes might need to drink juice. This would probably be a reasonable modification of a policy. 	Yes 🖌 No 🗌		
Service Animals (Under Titles II and III only dogs can be service animals. Miniature horses can be service animals in some circumstances.)			
 10. Are employees and officials aware that: a. The public entity must allow service animals to accompany people with disabilities in all areas where people without service animals are allowed to go? 	Yes No 🗸		Will educate staff on service animal regulations
b. Only two questions may be asked: (1) Is the dog a service animal required because of a disability? and (2) What work or task has the dog been trained to perform?	Yes No 🗸		Will educate staff on service animal regulations
c. The public entity may not ask about a person's disability, require medical documentation, require a special identification card or training documentation for the dog, or ask that the dog demonstrate	Yes No 🗸		Will educate staff on service animal regulations

Ques	tions		Comments	Next Steps
	its ability to perform the work or task?			
d.	A person with a disability cannot be asked to remove his service animal from the premises unless: (1) the dog is out of control and the handler does not take effective action to control it or (2) the dog is not housebroken and, in these circumstances employees must offer the person with the disability the opportunity to obtain goods or services without the animal's presence?	Yes No 🗸		Will educate staff on service animal regulations
e.	The public entity must permit a miniature horse to accompany a person with a disability where reasonable? Assessment factors include, the size and weight, whether the horse is housebroken, and whether its presence compromises safety requirements.	Yes No 🗸		Will educate staff on service animal regulations
Whe	elchairs and Other Power-Driven Mobility Devices			
11. Ai	re employees and officials aware that:	Yes 🖌 No 🗌		
a.	People with mobility disabilities may use wheelchairs, scooters and manually-powered mobility aids, such as walkers, crutches, canes, braces, or other similar devices designed for use by individuals with mobility disabilities in any areas open to pedestrian use?			
b.	People with mobility disabilities may use other power-driven mobility device in any areas open to pedestrian use unless the public entity can demonstrate that the class of other power-driven mobility devices cannot be operated in accordance with legitimate safety requirements?	Yes 🖌 No		
	Other power-driven mobility device means any mobility device powered by batteries, fuel, or other engines—whether or not			

Questions		Comments	Next Steps
designed primarily for use by individuals with mobility disabilities— that is used by individuals with mobility disabilities for the purpose of locomotion, including golf cars, electronic personal assistance mobility devices, such as the Segway® PT, or any mobility device designed to operate in areas without defined pedestrian routes, but that is not a wheelchair within the meaning of Title II. Some of the factors that go into determining "legitimate safety requirements" include: size and speed of the device, the facility's design and characteristics (outdoor, indoor), and risk of harm to the immediate environment.			
 c. They may not ask about the nature and extent of the individual's disability, but may ask an individual to provide a credible assurance that the mobility device is required because of the person's disability? Credible assurance includes a state-issued, disability parking placard or card, or other state-issued proof of disability or a verbal representation, not contradicted by observable fact, that the other power-driven mobility device is being used for a mobility disability. 	Yes 🖌 No 🗌		
Surcharges and Costs			
 12. Are employees and officials aware that the public entity may not place a surcharge on people with disabilities to cover the costs of measures, such as the provision of auxiliary aids or program accessibility, that are required to provide nondiscriminatory treatment? Examples: Charging a person who is hard of hearing for the cost of providing an assistive listening system for a state hearing. A housing authority requires an additional damage deposit if tenants have service animals. These are discriminatory policies. 	Yes 🖌 No 🗌		

Questions		Comments	Next Steps
Ticketing (Not parking tickets, tickets for events that have seating.)			
13. Are tickets for accessible seats sold during the same hours; through the same methods of purchase (by telephone, on site, through a website, or through third-party vendors); and during the same stages of sales (presales, promotions, general sales, wait lists, or lotteries) as non-accessible seats?	Yes No No	A	
14. If accessible seating is not available in areas of the venue with lower prices, is lower priced accessible seating available in higher priced locations?	Yes No	A	
15. Do venues and third-party sellers provide the same information about accessible seats as provided about non-accessible seats?	Yes No	A	
Example: Maps or displays of seating configurations must include information on accessible seating.			
16. Can ticket sellers describe accessible seating in enough detail to permit the purchaser to determine if a seat meets his or her needs?	Yes No No	A	
17. Do ticket sellers know that people purchasing a ticket for a wheelchair space may purchase up to three additional seats for their companions as close as possible to the wheelchair space and that these companion seats may include wheelchair spaces?	Yes No No	IA	
 18. Do ticket sellers know that unsold accessible seats may be released and sold to members of the general public in only one of three circumstances: when all non-accessible seats have been sold (excluding luxury boxes, club boxes, suites, and seats the venue holds back when declaring a sell-out); or 	Yes No	A	
 when all non-accessible seats in a particular seating section have 			

Questions		Comments	Next Steps
 been sold; or when all non-accessible seats in a particular price category have been sold? 			
19. If the venue permits patrons to give or sell their tickets to others, does the venue know that the same right must be extended to patrons with disabilities and that those tickets may be sold to someone who does not have a disability?	Yes No	NA	
A venue may choose to move a patron to another seat in order to give that accessible seat to a patron with a disability who requires it, but is not obligated to do so.			
20. Do ticket sellers know that for single event tickets, venues may ask purchasers to state that they require, or are purchasing tickets for someone who requires, the features of an accessible seat?	Yes No	NA	
21. Do ticket sellers know that for series of events tickets, purchasers may be asked to attest in writing that they require, or are purchasing tickets for someone who requires, the features of an accessible seat?	Yes No	NA	
Other			
22. Is information about the public entity's accessible services, activities and facilities available to the public and to current and future program <i>participants?</i>	Yes No 🗸		Will address in ADA statement
<i>Example</i> : A state department of recreation includes information about accessible swimming pools, fishing piers, boat launches, picnic and camping areas on its website and in a brochure.			

Program Accessibility

S	kagit Council of Governments			2	4/21/2022
Public Entity				Date	
	Grant Johnson		grantj@scog.net		(360)416-6678
Contact Person	l	Email		Phone	

Public entities must ensure that people with disabilities are not excluded from programs, activities, and services because of inaccessible facilities. Each facility is not necessarily required to be accessible. A public entity's services, programs, or activities, when "viewed in their entirety," must be accessible. This standard is known as "program accessibility" and is a key requirement under Title II. Structural changes are not required where there are other feasible solutions such as moving a class to an accessible location when a student with a disability needs to be in an accessible location or having a librarian retrieve books from an upper story. However, structural changes lead to increased integration and shoud be considered where feasible.

Programs, Activities and Services	Nonstructural Solutions	Structural Solutions
List programs, activities and services that are in <u>inaccessible facilities</u> . For each indicate nonstructural and structural solutions. Structural solutions should then be included in the transition plan. Nonstructural solutions can be included in the action plan.		
1. Regional Transportation Planning	Accessible Facility	NA
2. Growth Management Act Administration	Accessible Facility	NA
3.		

	Programs, Activities and Services	Nonstructural Solutions	Structural Solutions
4.			
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			
13.			

	Programs, Activities and Services	Nonstructural Solutions	Structural Solutions
14.			
15.			
16.			
17.			
18.			
19.			
20.			
21.			
22.			
23.			

Website Accessibility

Public Entity	Skagit Council of Governments	Da	4/21/2022 te
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Many people with disabilities use assistive technology such as screen readers, text enlargement software, and programs that enable people to control the computer with their voice, eyes or nose. Access problems occur when website designers assume that everyone sees and accesses a webpage in the same way. Accessible website design recognizes these differences and does not require people to see, hear, or use a standard mouse in order to access the information and services provided.

Questions		Comments	Next Steps
 Is there a policy that the public entity's webpages will be accessible, that is, in compliance with the W3C Web Content Accessibility Guidelines (WCAG) 2.0 or Section 508 Standards? 	Yes No 🖌		Will create policy
Are the staff and contractors who are responsible for webpage and content development aware of the policy?	Yes 🗌 No ✔		Will create policy
3. Are the staff and contractors who are responsible for webpage and content development knowledgeable about these standards?	Yes No 🖌		Train staff
4. Has the website been tested for compliance with either of these standards?	Yes No 🗸		Test website
5. If yes, have people with disabilities who use screen reading software and other assistive technology participated in the evaluation?	Yes No 🖌		
6. Is there a plan for making the existing web content accessible?	Yes 🖌 No 🔄 ad	/ebpage has ccessibility options nenu	

Questions		Comments	Next Steps
7. Is there a plan for making future web content accessible?	Yes 🖌 No 🗌		Will keep accessibility widget on website
Other:	Yes No		